Transcript of the Deposition of:

Walter Walker

Date: August 18, 2006

MACON COUNTY INVESTMENTS, INC, et al

Vs

SHERIFF DAVID WARREN

Case No. 3:06-CV-224-WKW

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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION

MACON COUNTY INVESTMENTS, INC.,
REACH ONE, TEACH ONE OF
AMERICA, INC.,
Plaintiffs,
CIVIL ACTION
VS.
FILE NO. 3:06-CV-224-WKW

SHERIFF DAVID WARREN, in his
official capacity as the SHERIFF OF
MACON COUNTY, ALABAMA,

Defendant.

* * * * *

DEPOSITION OF WALTER WALKER taken on behalf of the Defendants, pursuant to the stipulations set forth herein, before Jeana S. Boggs, Certified Court Reporter and Notary Public, at the offices of GRAY, LANGFORD, SAPP, McGOWAN, GRAY & NATHANSON, 104 West Northside Street, Tuskegee, Alabama, commencing at approximately 3:23 p.m., Friday, August 18th, 2006.

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APPEARANCES OF COUNSEL

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ALSO PRESENT:
MR. DAVID WARREN
MR. FRANK THOMAS, III

* * *

PLAINTIFF'S EXHIBIT INDEX

Defendant's Exhibit No. 8.......................7
Defendant's Exhibit No. 9......................26
Defendant's Exhibit No. 10....................119
Defendant's Exhibit No. 11....................121
Examination By Mr. Gray - 6,
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* * *

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STIPULATIONS

It is hereby stipulated and agreed by and between counsel for the respective parties and the witness that the deposition of WALTER WALKER, is taken pursuant to notice and stipulation on behalf of the Defendants; that all formalities with respect to procedural requirements are waived; that said deposition may be taken before Jeana S. Boggs, Certified Professional Reporter and Notary Public in and for the State of Alabama At Large, without the formality of a commission; that objections to questions, other than objections as to the form of the questions, need not be made at this time, but may be reserved for a ruling at such time as the deposition may be offered in evidence or used for any other purpose as provided for by the Federal Rules of Civil Procedure.

It is further stipulated and agreed by and between counsel representing the parties in this case that the filing of the deposition of WALTER WALKER, is hereby waived and that said deposition may be introduced at the trial of this case or used in any other manner by either party hereto provided

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for by the Statute, regardless of the waiving of the filing of same.

It is further stipulated and agreed by and between the parties hereto and the witness that the signature of the witness to this deposition is hereby not waived.

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WALTER WALKER,

of lawful age, having been first duly sworn, was examined and testified as follows:

DIRECT EXAMINATION

THE REPORTER: Usual stipulations?

MR. THOMAS: That's fine. Read and sign.

BY MR. GRAY, JR:

Q Sir, my name is Fred Gray, Junior. Along with Fred Gray, I represent Sheriff David Warren in his official capacity as Sheriff in this action. I'm going to ask you a series of questions today. If at any time I ask you a question that you don't understand, let me know that you don't understand it, and I'll be happy to rephrase it. Or if you don't hear me when I ask you a question, if you will let me know, I'll repeat the question or questions similar to it.

State your name for the record, please.

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A Walter Walker.

Q And, Mr. Walker, I'm going to show you what has been marked as Defendant's Exhibit Eight.

(At which time, the referred-to document was marked as Defendant's Exhibit No. 8 by the Reporter.)

Q I'll show it to your lawyer first and then to you. And upon review -- Let me know once you have reviewed that document, sir. Have you had a chance to review it?

A I looked at it.

Q Okay. And have you seen -- What is it for the record? What is this document? What's the title of it?

A In the United States District Court for the Middle District of Alabama, Macon --

Q Let me interrupt you. Just come down to -- just a little bit further down in the middle of the page.

A It says, "Sheriff David Warren in his official capacity as Sheriff of Macon

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County, Alabama."

Q Come down a little bit further to the middle of the page.

A "A defendant's notice of deposition Duces Tecum or the Reach One Teach One of America.

Q Okay. All right. And have you seen that notice of deposition before today?

A This? Yes.

Q All right. And it requests certain documents in addition to your attendance here today.

A Yes.

Q Do you have the document or any documents in response to the request? Have you brought any such documents today?

A The 1023 you should have got from Greg Carr. The minutes of the board burned up in my personal L320. The copy of Reach One's annual federal report does not require me to set tax because of income. I haven't gained anything above twenty-five thousand ($25,000) dollars.

Q All right. Let me see. So, with respect to

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number seven, copy of all IRS Form 990s filed by Reach One Teach One.
A We don't have to. The only time you do that is when you go above twenty-five thousand ($25,000) dollars.
Q And you have not --
A No.
Q -- exceeded that threshold, and that's why you have no copies here today.
A Precisely.
Q Because you haven't filed none.
A Precisely.
Q Okay. And with respect to the Form 1023 completed by Reach One Teach One --
A Well, that was given to, I think, Attorney Carr. Attorney Carr has that.
Q All right.
A And he should have given it to you. He said he had it. I thought he gave it to you.
Q Okay. Did he give that to you in response to his request for that particular form?
A No. Why would he give it to me? I had it, and I gave it to him. I did the 1023.

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Q All right.
A I gave it to him.
Q All right.
A Okay.
Q And you don't have a copy here today?
A No. If he told me to bring one, I would have.
Q All right.
A I was under the impression that he had it.
Q All right. So, you're saying you don't have it.
A Correct.
Q You don't have a copy?
MS. JONES: Do you have a determination letter?
THE WITNESS: Letter of Determination?
MS. JONES: Un-huh (positive response). But we didn't get it.
Q But you have given a copy of your 1023 to Attorney Greg Carr?
A Yeah.
Q All right.
A If not, I'll go home and pull up another

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one.
Q Let me ask you this question: What's your position with Reach One Teach One of America, Inc.?
A Founder and president.
Q And when was it incorporated?
A April 8th, 1996.
Q Yes, sir. At that time, did the corporation have an attorney?
A No.
Q Even right now, does the corporation have an attorney?
A Well, yes, because I asked Greg Carr to do that. We had spoken to Ms. Biggers a long time ago, but that was his job. But, no, Greg Carr is the latest one.
Q All right. And he is your attorney right now?
A Not officially. You know, it's just mouth-to-mouth. It's nothing on paper. You know, I had asked him once that I found what they were trying to do. And, well, we were -- We need something because I have an

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MOA of Jowayayjan entertainment, which is also correlated with Reach One Teach One.
Q All right. And we'll get to that. And when you say "MOA," what is an MOA?
A I'm sorry. MOU.
Q Okay.
A Memorandum of understanding.
Q And you have a memorandum of understanding with who?
A Well, Jowayayjan Records.
Q Spell out Jowayayjan.
A It's the first two letters of my daughters -- my children's names: Joyce, Walter, Yolena (phonetic), Y'Jori, and Andrenica.
Q All right.
A J-O-W-A-Y-A-Y-J-A-N.
Q All right. And you have a memorandum of understanding between Reach One Teach One of America and that particular entity?
A (Nodding in the affirmative.)
Q And how do you pronounce it again?
A Jowayayjan.
Q Jowayayjan?

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A Joway -- yeah.
Q **Jowaya.**
A Yeah. Jowayayjan.
Q **Yes, sir. Okay. And I think you said, yes, there is a memorandum of understanding between that entity and Reach One Teach One of America?**
A Yeah, it simply means --
Q **I don't want to ask you about it just yet.**
A Okay.
Q **There are some other things I want to get to before I get to that.**
A Okay.
Q **We also requested a copy of all minutes from meetings of Reach One Teach One.**
A Remember I told you they burned up in my ML 320 on Highway 80.
Q **All right. So, when you say your "ML 320," that's an automobile?**
A Yeah.
Q **All right. Yes, sir. And when was that fire?**
A Oh, my goodness. August 4th -- August 9th

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2004.
Q **August 9th, 2004?**
A Uh-huh (positive response).
Q **All right. And were the only minutes -- Well, were the only minutes that you had in that car?**
A No. All the minutes were in the car. See, with us -- Well, I'll let you ask that question. Do you want me to explain it?
Q **Go ahead.**
A Yeah. Minutes are only done annually unless I call something special. If there's a special event, I call for a special meeting. So, you know, if there was something special we had the minutes. When we would go places, do things, we call special minutes. We would write everything, me and my wife would. Minutes are only annually.
Q **All right.**
A So, every year we get down blah, blah, blah. See what's done for the year. Or if there's some special reason or a new board member or striking of a board member or some special

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specificity or occasion or something like that.
Q **So, does Reach One Teach One of America meet more than once a year?**
A If it's a reason to.
Q **All right.**
A And we had, and there were reasons to.
Q **All right. And we'll go through those momentarily. We also requested a copy of your annual tax return filings for the years 2000 through 2005 inclusive to which you have responded --**
A Yeah.
Q **-- that you don't have any such filings; is that correct?**
A Yeah. Don't need to.
Q **Okay. And when you say you don't need to --**
A That's an NA, not applicable.
Q **All right. And why is it not applicable?**
A Because, again, you've got to have twenty-five thousand ($25,000) dollars more of grant money.
Q **Got you. In revenue?**

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A Grant money. Grant money.
Q **All right. Now, what's your date of birth, please, sir?**
A 11/9/48.
Q **How old are you?**
A Fifty-seven.
Q **What is your current mailing address?**
A 211 Oslin Drive, Tuskegee, Alabama, 36083.
Q **All right. And what is your current physical address?**
A 211 Oslin Drive, Tuskegee, Alabama, 36083.
Q **All right. And whose name is that property titled?**
A Walter Walker, heir of Cora Fan Walker.
Q **All right. So, now is the title actually in your name, or is the deed still in your mother's name, the title itself?**
A I had the titles put in all of my brother's name. I gave them all a piece of the house. So, my house is still -- you know, it changed. I changed it.
Q **All right. In whose name is the property assessed?**

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A It was me, Walter Walker. Or when she passed, you know, I moved in the house and started the upkeep of the house. I actually paid the house off. It was in Mr. Parker's name. Now, the way it's deeded in the probate office is Walter Walker, heir of Cora Walker. And since then, I got with Glenn Parker, and we changed it and put all the family -- I put all the family members name on there.
Q All right. So, you're saying title is in the family members' name?
A It should be. That's what we had -- I had Glenn Parker, who was another lawyer, to do it, who was Mr. Parker, which my mother bought the house from.
Q Uh-huh (positive response). Do you have a copy of the deed?
A No, I didn't.
Q All right. Did you ever receive a copy of the deed?
A No, I didn't.
Q And who would have signed the deed as the

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grantor conveying that property to you and your siblings?
A It probably would have been Glenn Parker.
Q All right. Glenn Parker would have been the person signing, not preparing the deed.
A No. He was the person that signed it. I think somebody else signed it, you know.
Q All right.
A I haven't seen the document, so I assume he had.
Q All right. Let's go through addresses where you have resided or places where you have resided over the past -- start before the past ten years. You say you currently live at 211 Oslin Drive, Tuskegee?
A Uh-huh (positive response).
Q All right. That's a yes?
A Yes.
Q All right. And for how long have you lived there?
A I came back in 1992.
Q From 1992 --
A March of 1992.

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Q Yes, sir. From March 1992 to the present, is that the exclusive residence at which you have lived?
A Uh-huh (positive response).
Q Is that a yes?
A Yes.
Q All right. Have you ever claimed residence anywhere else?
A No.
Q All right. And are you married?
A Yes.
Q What's your wife's name?
A Cornelia.
Q Spell that, please.
A C-O-R-N-E-L-I-A.
Q And what's her maiden name?
A Foster.
Q Yes, sir. Where is she from?
A Belle Glade, Florida.
Q What part?
A Florida.
Q What part?
A Belle Glade.

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Q And what is her date of birth?
A 12/26/63.
Q Yes, sir. For how long have you been married?
A Oh, man.
Q It's not a test. We won't tell.
A Sixteen years.
Q Sixteen years? Okay. Prior to marrying your current wife, have you been married before?
A Yeah.
Q Okay. And you said yes?
A Yes.
Q What was that previous wife's name?
A Roxana Irene.
Q Spell that last name.
A R-O-X -- You want her last name?
Q Well, let's get both.
A R-O-X-A-N-A White.
Q White. Okay. And for how long were you married to Roxana White?
A Oh, man. Seventeen years, I think it is.
Q Yes, sir. And how did that marriage end?

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A We're divorced.
Q Okay. Where does she now live?
A Louisville, Kentucky.
Q Do you and Roxana White have any children or did you have any children?
A Yes. Joycie, Walter, Yolena.
Q All right. Say those names again, please.
A Joyce, Walter, and Yolena.
Q Okay. And where does each one live?
A In Kentucky.
Q All three?
A Kentucky.
Q All right. How old is the youngest of those three, approximately?
A Twenty-five.
Q Okay. And do you and your wife Cornelia have any children together?
A Yes.
Q How many?
A Two.
Q And what are their names?
A Y'Jori and Andrenica.
Q All right. Spell Y'Jori, please.

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A Y-'-J-O-R-I.
Q And spell Andrenica if you will, please.
A A-N-D-R-E-N-I-C-A.
Q Thank you. Where do they live?
A Well, they live with their mother in Florida.
Q Okay. And where in Florida do they live?
A Tallahassee.
Q What's that address?
A 410 Victory Garden Drive.
Q And do you have a corporate address at that location?
A I'm going to put one there. Not yet.
Q Not yet?
A No.
Q All right. Have you ever had a -- Has Reach One Teach One of America ever had an address or a resident agent in Tallahassee, Florida?
A No. I am. I haven't done it, but I'm going to do that.
Q Yes, sir. And what about in Georgia?
A Yes.
Q Has Reach One Teach One of America had a

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corporate address or a resident agent in the State of Georgia?
A Yes.
Q All right. For how long has your wife and two children lived in Tallahassee?
A Well, she went first -- Andrenica went to school here. Maybe about 18 to 24 months. I'm going to put it like that because I'm going to have to start guessing and figure out what month they left.
Q All right. Andrenica is in the ninth grade; is that correct?
A She's going to. Yeah, ninth grade, that's right.
Q Has her school started yet?
A School as started.
Q School has started. And did she attend eighth grade in Tallahassee?
A Uh-huh (positive response).
Q Is that a yes?
A Yes.
Q And did she also attend seventh grade in Tallahassee?

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A No.
Q Where did she attend seventh grade?
A Tuskegee, Tuskegee -- what do you call it? Tuskegee Public. No, not Tuskegee Public. Oh, man.
Q Rather than --
A Hang on. The school is over by Tuskegee Institute. It used to be Tuskegee Institute High. What's the name of it now?
Q Yes, sir. Okay.
A What's the name of it now?
Q Was she in middle school at the time?
A Yeah.
Q All right.
A I forgot the name of the school.
Q All right. Well, I just told you.
A What's the name of it?
Q The middle school.
A Tuskegee Middle School. Right. Tuskegee Middle School.
Q All right. So, Tuskegee Institute Middle School?
A Yeah.

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Q Did she complete the seventh grade here in Tuskegee?
A Did she start or did she -- I think she came -- no, no. She didn't complete it. She started.
Q So, did she complete the first semester in Tuskegee in the seventh grade?
A I'm not for sure. Maybe so, maybe not. We left early to go down with her. I would say no.
Q All right. So, it would be fair to say that from some point in 2003 or 2004 --
A 2004.
Q All right. Sometime between 2004 is when your family moved to Tallahassee, Florida.
A No.
Q That would not be fair to say?
A No, that's totally incorrect.
Q Okay.
A My wife was there first.
Q All right. When did she move?
A She left in August. She got a job.
Q All right. August 2004?

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A 2004.
Q All right.
A And she set up housekeeping. So, Andrenica didn't want to stay in Tuskegee. So, I moved her down there with her.
Q All right. So, to the best of your recollection, then, now that you reflect on it -- So, she really would have started school in Tallahassee.
A No, she actually started up here.
Q Okay.
A Then she was taken out.
Q Okay.
(At which time, the referred-to document was marked as Defendant's Exhibit No. 9 by the Reporter.)
A They sent the record down when she started.
Q I show you what's been marked as Defendant's Exhibit Nine. Can you identify that document, sir?
A Macon County property assessment record.
Q All right. And for what property is that assessment for?

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A It says Cora Mae Walker, heir, in care of Walter Walker, 211 Oslin Drive, Tuskegee, Alabama.
Q All right. And that's the place where you reside, you say?
A Uh-huh (positive response).
Q Is that a yes?
A Yes.
Q Okay. Who paid the taxes this past year at the revenue commissioner's office on that parcel of property?
A Jackie Walker.
Q And what is your relationship to Jackie Walker?
A She's my sister-in-law.
Q All right.
A Well, my ex-sister-in-law.
Q Yes, sir. Do you have any relatives in Macon County currently?
A When you say "relatives," you don't -- friends?
Q Blood -- blood relatives.

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A In Macon County. Blood, yes.
Q Who are they?
A Randy Wallace.
Q And your relationship, if you will.
A He's my brother's -- Andrew's son.
Q All right.
A The Wilsons.
Q Which Wilsons?
A George Wilson, Mary Wilson, Betty Wilson, the Wilsons, they are still my relatives.
Q All right.
A Ronald Wilson. Let's see who else is relatives of mine. Ronald Gibbs, Arlie McCall -- is she Arlie? No, her name's not -- Arlie McMillan.
Q Uh-huh (positive response).
A Maybe more, man. I can't think of them all.
Q Yes, sir. And do you have any relatives -- I'm just going to ask you about a few of the surrounding counties. In Montgomery County?
A Yes.
Q And who are those relatives?
A Oh, my goodness. Let's see. There's Hilda.

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Q As a matter of fact, let me do this if I can just to save some time.
MR. GRAY, JR: Counsel, do you mind just furnishing a copy of Mr. Walker's relatives in the Middle District, which would be in -- if this ever were to go in any -- Is this a jury trial? Don't worry about it. I don't even need that. I don't need it.
MR. GRAY: Excuse me.
(At which time, there was an off-the-record discussion.)
BY MR. GRAY, JR:
Q Let me ask you this going back to your living at Oslin Drive. Are the utilities on there right now?
A No. I let my little nephew stay in it, and he was supposed to pay it. I said, "If you stay, you pay." And he didn't, and they cut them off.
Q What's your nephew's name?
A That's Randy.

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Q So, nobody is physically there right now; is that correct? Nobody is living in the house right now.
A Randy is in the house.
Q He is in the house?
A Yeah. I've got to pay the money to turn the lights back on.
Q All right. And when did you first state to Randy that he could stay in the house as long as he kept staying.
A That's about a month ago. I can't pinpoint the exact date.
Q All right.
A A month or more, maybe six or eight weeks ago.
Q Yes, sir. Let's just say in January of 2006, during the month of January 2006, would you have lived in Florida more than you did in Alabama, in Tuskegee?
A What do you mean? We come back every weekend.
Q All right. You come back to Tuskegee every weekend?

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A Yeah.
Q So, you may spend five days in Tallahassee, two days in Tuskegee?
A Well, if I'm working, I would. If I'm not, you know, I'll come back sometime during the week. All we did -- We didn't move no furniture or nothing. That house still sits the way we are. She moved in. We just bought furniture for the apartment. You know, so if we get ready to move, you know, we might sell the furniture.
But we didn't move out of that house. The house is not empty. It's just the way we left it. All the beds, three bedrooms, all the couches, living room, den, everything is full.
Q Would it be fair to say that the majority of your time, though, is spent in Florida in Tallahassee versus in Tuskegee; would that be fair to say?
A It would be probably fair to say.
Q Okay. And what's Randy's last name?
A Wallace.

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Q How old is he?
A 1974, so he will be 32 -- '75. So, he's 31
Q All right. 31?
A Yeah.
Q Where did you attend high school?
A Tuskegee Institute High School.
Q And graduated?
A Yes, I did.
Q What year?
A 1967, May.
Q Yes, sir. Did you attend college?
A Yes, I did.
Q All right. Where did you go?
A Lincoln University, Jefferson City, Missouri, '67 to '71. Wichita State --
Q Lincoln, did you get a degree?
A Yes.
Q All right. What was that in?
A What's it in? BS degree in Education.
Q Yes, sir.
A Wichita State University, 1972 to 1975.
Q Okay.
A Master's degree in Education. Auburn

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University, 1993 to 1995, BA in Liberal Art.
Q **All right. What prompted you to go to Auburn in the '90s after having already attained a BS and a Master's?**
A Well, because I was under Chapter 30 of the United States Air Force Code. And once I retired in '91, they would give me twenty-five hundred ($2,500) dollars a month to go to school. So, I just had to earn a degree to get the money. You've got to use it or lose it.
Q **Yes, sir.**
A So, I was earning degrees before I could get, you know -- run out of money. So, hey.
Q **Yes, sir. And do you have any other -- or any additional college training?**
A No.
Q **Let's go through your employment history. What is your current employment? Where are you currently employed?**
A Retired military, United States Air Force.
Q **When were you in the Air Force?**
A When, did you say or where?

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Q **When.**
A From October 14th, 1971, to November the -- actually, October 30th 1991.
Q **And you retired from the Air Force?**
A I sure did.
Q **All right. What was your rank?**
A Master sergeant.
Q **Okay. And on a day-to-day basis today, do you work anywhere?**
A No.
Q **From 1991 when you retired from the Air Force to the present, have you worked what many would call a traditional job?**
A Yeah, actually I sub-taught for awhile.
Q **All right.**
A Then I taught at South Highlands Elementary School. I worked at Tuskegee -- track coach at Tuskegee University.
Q **All right. Let me do this if I can. We'll just start in '91 and work our way up to 2006.**
A Okay.
Q **All right. So, starting when you retired**

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from the Air Force, did you work?
A Sub-teaching.
Q **Substitute?**
A From '92 to 1999.
Q **All right. Where did you substitute teach?**
A Wherever they -- you know, Macon County Board of Education asked me to.
Q **All right. And from one school to another within the Macon County Board of Education?**
A Yeah.
Q **All right. And after 1999?**
A '99 to 2001, I worked with Tuskegee University, assistant track coach.
Q **Okay. At that time, did they have a track where people could compete?**
A Yeah, it was a track.
Q **Do they have a track where students can compete now?**
A Yeah, I think they do. I don't know. I'm not working with them.
Q **They did at that time, though.**
A Yeah.
Q **All right. After 2001.**

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A 2002 to 2003 South Highland Elementary School.
Q **Where is that?**
A Union Springs, Alabama.
Q **All right. And what did you do there?**
A Teaching.
Q **Why did you stop teaching there?**
A Well, I think they have something they call proration here. Plus, me and the superintendent had a big thing about money. I think they were shorting me twenty thousand ($20,000) dollars a year with my degrees. I Took it to Ed -- I forgot what Edward's name be -- who was the superintendent for education there. And he granted me the money. But, you know, they decided under proration that they couldn't give me the money. So, they hired a kid right out of college because they couldn't afford me.
Q **Okay. You said they shorted you twenty thousand ($20,000) dollars?**
A Well, you know, with my experience and with

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my degrees that I actually should have been given more money. I use that as a number. You know, we didn't actually get down to the, you know, nuts and bolts and see exactly how much it was. But I had spoken to him. I think the guy there was Saint T. Thomas at the time that I spoke to was the superintendent of the Bullock County Board of Education. But Mr. Ballard, who was assistant superintendent, you know, decided to go to the Board, and they decided they couldn't afford me through proration at that particular time. And so, I was let go.
Q **All right. So, did that occur during the course of the school year or after the entire year?**
A After. I had gone all the way through.
Q **All right. And they just did not renew you.**
A That's right.
Q **All right. And then after 2003.**
A 2003 to 2004 nothing. 2004, I went down with my wife. She said come on down with her because, you know, naturally one would

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want to be with the wife. So, she had an apartment there. So, I went down and I worked selling cars a little while from 2004 --
Q **For whom did you sell cars?**
A For Tallahassee Hyundai.
Q **All right. For how long did you do that?**
A Oh, I did it for -- let me see -- five months the first time. Took a blower. Didn't work for 90 days because I made a little money and quit because I didn't have to work. Then I worked again. Then worked nine months again, then took another blower.
Q **When you worked the nine months was that also at Tallahassee Hyundai?**
A Yeah.
Q **Did you say Hyundai or Honda?**
A Hyundai, H-Y-U-N-D-A-I.
Q **Right. Okay. So, is that -- Are we now in '04, '05?**
A Yeah, we're all the way in '05.
Q **All right. When did you stop working at Tallahassee Hyundai?**

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A Well, I went back for six more months and quit. That was in January '06, and I quit. I then stopped.
Q **All right. And currently, are you working anywhere?**
A No.
Q **Where is your wife employed?**
A Florida A and M University.
Q **What does she do at Florida A and M?**
A Well, she was directorate counselor, but she's just been promoted to adviser to the vice-president.
Q **Okay. I think you stated that she started working in Florida, although you didn't say at Florida A and M at that time.**
A Yes, that's what it was.
Q **Okay. So, starting in 2004 when she left to take a job, that's when she started?**
A Uh-huh (positive response).
Q **Okay. Is that a yes?**
A Yes, I'm sorry. Y-E-S.
Q **And she has worked at Florida A and M continuously --**

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A Yes.
Q **-- from August 2004 to the present.**
A Yes.
Q **Prior to that, where did your wife work immediately prior to that?**
A Tuskegee University.
Q **All right. For how long and in what capacity did she work for Tuskegee?**
A Oh, man. I would say for three years, from 2001 to 2004. Don't hold me on that. I'm not for sure.
Q **Okay. In what capacity?**
A The same thing she's doing, counseling.
Q **All right. Why did she leave Tuskegee University's employment?**
A For A and M doubled the money.
Q **All right. So, did she resign --**
A Yes.
Q **-- Tuskegee University?**
A Yes, she did. She resigned and signed a contract with Florida A and M.
Q **All right. And before she worked at Tuskegee University, where did she work?**

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A Oh, God. What's the name of that school? A little school in Notasulga. What's the name of that?
Q A public school in Notasulga?
A Yeah. It's right down -- Oh, man. I can call her. I can put her on speakerphone, and we can get this straight.
Q No. She's an officer of Reach One Teach One. She may get her own opportunity.
A Oh, you don't want her up here, man. It would be a mess. You don't want her.
Q And before she worked at whatever school that was in Notasulga -- Well, for how long did she work there?
A A year.
Q All right. And before that, where did she work?
A Tuskegee University.
Q In what capacity?
A She worked with -- Well, she worked for the U.S. -- U.S -- I don't remember, man. She worked for the kids -- the disparaging kids that their president was helping them house

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the kids on Tuskegee University. It's like a U.S.O. something. I would have to ask her.
Q All right. When you are in Tuskegee, Macon County, Alabama, where do you attend church?
A Sometimes I go to Copeland's. Sometime I go to -- Oh, no, no, no, no. I see what you're saying. I'm thinking about preaching. We are members of the church, Lakeview, in Auburn.
Q All right.
A Yeah, we are members there.
Q Okay. What denomination is that?
A Baptist, Southern Baptist.
Q Yes, sir. So, do you have any -- you never attended divinity school, did you?
A Lutheran.
Q All right. When was that? And tell us about that, please.
A It's a class. I mean, I attended simply for -- Well, actually, I attended for the purpose of the military was paying me money, and I wanted to learn. After I got the

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world religious degree at Auburn, I kind of wanted to learn about all the denominations. So, some I sat in for free, and some they actually paid me to sit there.
Q And you said the world religions degree?
A It's a BA in Liberal Arts.
Q Okay.
A But it's a world religious degree.
Q Yes, sir. All right. Let me ask you this: Have you ever given a deposition before?
A No.
Q All right. Have you ever testified in court before?
A No.
Q Have you ever sued anybody before?
A No.
Q Have you ever been sued?
A No.
Q Has Reach One Teach One ever been involved in any litigation before?
A No.
Q Have you ever filed bankruptcy?
A No.

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Q Have you ever been arrested?
A No.
Q What is your -- Do you have an Alabama driver's license?
A Yes.
Q What's your license number?
A 2596972-AL. 2596972-AL.
Q Now, let me ask you about Reach One Teach One. I think you said you incorporated it in 1996; is that correct?
A Yes. Uh-huh (positive response).
Q And who was part of the incorporation? Who were the incorporators?
A Myself, my wife, and initially a female named Beverly Ritzi, R-I-T-Z-I.
Q And who is Beverly Ritzi?
A Oh, man, she's a friend of my wife's. But she's not on it anymore.
Q No longer a friend or no longer --
A We just don't see her no more. I think she moved out of town.
Q All right.
A They are always friends. We don't drop our

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friends.
Q Whose idea was it to form Reach One Teach One of America?
A Mine.
Q Okay. And what generally was the purpose? What did you have in mind when you organized it?
A Actually, it was a way that I found out that I actually could get free money to help the people in the community. What really blew my mind and when I came back to Tuskegee, it was in worse shape than the way it was when I left it in '67. So, I come back in '92, and I look at the buildings. My God, what's happening here? So, then I -- we're talking to -- You know, we go to church. We started visiting the churches around, and we see so many disparaging old people. We see people that needs help. The front of the houses are falling in. So, then I got with a guy out of Atlanta named Billy Paul, and he actually put together a 501(c(3) for me, helped me in getting one.

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Q Had you ever done one before?
A Not before he taught me, no.
Q All right. And did you find the process easy to do?
A Yeah. I've got a pretty good brain.
Q All right. So, in 1996, what did Reach One Teach One of America actually do?
A Well, what we began to do is actually get with the kids, formulating scholarships. We researched Washington, all the free programs we had out there. And Washington would send us all the books they had and all the programs they got. Then we got all the programs that's beneficial for Tuskegee. They would actually -- We got all the funding sites that the United States had. Then we got -- They sent us sheets of all the big funding sites that the Federal and local government's are. Then we got a compilation of books of 10,200 funding sites that we can help the people.
So, what we did with the kids sometimes who didn't have money, we would

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actually show them -- because I didn't know there was five or six different Pell grants in the State of Alabama. But the kids, they knew. So, we would actually write them and actually get the kids money for school.
Q All right. So, in 1996, that year that you started, that year, what -- is there anywhere --
A No, no, no, let me stop. Listen.
Q Are you correcting something that I just asked you?
A No. Yeah, I'm going to correct something.
Q Okay.
A When I say what did they do in '96. In '96 from an official capacity, only we registered in the City, because until the Letter of Determination comes, we could not get the grants. However, we can function as a 501 until a Letter of Determination comes in. And it came in later on in '97.
So, you know, any time that we get the Letter of Determination, they actually prorate and go back to the time you

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initiated -- that you started your incorporation. So, until that time, we couldn't actually start dealing with the big government. But we were actually -- we were functioning in the community.
Q All right. Did you open a bank account?
A Yes, we did.
Q All right. And where is that account?
A It's at Maxwell Air Force Base, Montgomery, Alabama.
Q And is that account in the name of Reach One Teach One of America?
A It is, yes.
Q Okay. Does it have money in the accountant currently?
A No.
Q When is the last time that there was money in that account?
A Probably in July.
Q July of 2006, last month?
A Yeah. Mr. Thomas put it in for us.
Q All right. How much did he put in at that time?

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A Ten thousand, five hundred ($10,500).
Q And what was that for?
A Well, actually he put ten thousand, five hundred ($10,500) in for me to, you know, help the people of Macon County. And what I did, I sat down with him, and I told him I would -- actually, I would rather deal with the schools because that's who we'd been helping, you know, giving them paper and pencils and stuff. So, I sat and I talked to May Doris Williams. I talked to Mr. Asbury, and I talked to Doris Coleman.
Q All right. Let me interrupt you for just a moment. You talked to May Doris Williams. Who is May Doris Williams? What is her position --
A She is a principal of a school.
Q -- in the school system?
A She's the principal at one of the elementary schools.
Q All right. And you said you also spoke to Mr. Asbury.
A Asbury.

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Q What's his first name?
A I don't know. I can't remember.
Q All right.
A Principal Asbury is with Tuskegee Public.
Q All right. And that's an elementary school in Tuskegee?
A Uh-huh (positive response).
Q To the best of your knowledge?
A Uh-huh (positive response).
Q All right.
A And I spoke to --
Q You said Doris Coleman.
A Ms. Doris Coleman.
Q All right.
A I think she's changed schools. She was the principal at Washington Public. I think she's at the new school, whatever the name you guys call it.
Q All right. Elementary school?
A Yeah.
Q All right. So, you spoke to them. Go ahead.
A And I spoke to them, and I asked them, I

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said, "Listen. You guys got" -- I said, "I have some money I want to try to get to you." Oh, yeah. Excuse me. And I spoke to Little Treasures, Barry White's wife.
Q All right. When you say "Little Treasures," is that --
A It's a day care center.
Q All right. Okay. Barry White is deceased.
A Yes.
Q Okay. And his wife owns a day care center --
A Yes.
Q -- in Macon County, Alabama?
A Yes, yes.
Q Okay. Go ahead.
A Anyway, I told them that I am going to get some money, and I asked them was there anything they can use. I can help them. So, they all said they were making some trips somewhere, and that would help the kids on the bus trip. So, I told them I can give them two thousand ($2,000) dollars each. And, oh, they praised and hugged me.

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That's fine. Blah, blah, blah, blah, blah, blah.
Q Now, when is this? Is this last July?
A Whenever he gave me the ten thousand, five hundred ($10,500).
Q All right. I understood you to say that he gave it to you in July of 2006.
A No. Well, whenever we got it. I'm not -- I'm a stickler on days. Whenever we got the ten thousand, five hundred ($10,500) that they gave the money back that they showed you the letter of.
Q All right.
A What date was on that?
Q I don't know.
A Okay. Whatever date was on that.
Q All right. So, whatever the date of the check is you're saying that's when --
A That's when -- yes, yes.
Q That's when the conversation was, or that's when you got the money and put it back in your account?
A Oh, no, no, no, no, no.

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Q **Frank Thomas put the money in your account.**
A No, no. Whatever that date is, it's several days before that. A week before that.
Q **All right.**
A Find out when was that. Or, you know, we can go down to Maxwell and find out. I should have my wife on speaker phone because she knows all that.
Q **Okay. I show you, sir, what's been previously identified as Defendant's Exhibit Six.**
A Okay. It was in February, then. My bad.
Q **Okay. And Defendant's Exhibit Six is a letter from Attorney Deborah Biggers to Mr. Frank Thomas; is that correct?**
A Yes.
Q **All right. Does that now refresh your recollection --**
A Or March.
Q **-- of when Frank Thomas put ten thousand, five hundred ($10,500) dollars into Reach One Teach One's account?**
A That's March.

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Q **March?**
A Hey, I'm not good remembering.
Q **All right. So, is it your testimony now that March 2006 is the last time that Reach One Teach One of America, Inc., had money in its account at Maxwell Air Force Base?**
A Right.
Q **All right. Realizing that this letter is dated March 31, 2006. It's the end of a month.**
A Yeah. It was before that. It may have been several weeks before that.
Q **All right. Were you here in Tuskegee in 2003?**
A Yes.
Q **Let me ask you this question. Let me go back. Because you've been -- You're from Tuskegee.**
A I was born here 57 years ago.
Q **All right. And you've been pretty active in the community, would you say?**
A Always.
Q **All right. And have you had any political**

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offices? Have you held any political offices?
A No.
Q **Have you held any appointed positions from the mayor or City Council in Tuskegee?**
A No.
Q **All right. Do you consider Johnny Ford, Mayor of Tuskegee, to be a friend of yours?**
A Yes, for 57 years.
Q **In 2003, were you in Tuskegee on a day-to-day basis?**
A I worked at South Highland in Union Springs.
Q **All right. And did you live in Tuskegee at that time?**
A Yes.
Q **All right. With your wife and your children?**
A Yes.
Q **All right. Were you in Tuskegee during the time of the voting on trying to get bingo in Tuskegee or in Macon County?**
A Yes.
Q **Were you here then?**

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A Uh-huh (positive response).
Q **Were you involved at all in any of -- well --**
A No.
Q **Not at all?**
A No.
Q **Okay. What was your opinion of the attempt to have bingo in Macon County?**
A I didn't have one.
Q **No opinion at all?**
A Uh-uh (negative response).
Q **Do you have an opinion now about it?**
A I still don't have an opinion about it. My whole issue with the bingo thing -- forgive me if I be too spiritual with this thing. You see, I look at that, you know -- 14 of 22 of Proverbs say that the wealth of the sinner is laid in store for the righteous. So, if you want to go spend your money and send that way, I'm going to take that money and help people with it. You know, I know God said in Deuteronomy 23:17 through 19, I can't take the hire of a harlot and go tithe

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it. But it tells me in Isaiah 23:17 to 19 that I can take that money and make it righteous to those people that sinneth in err.

So, my thing is not the mumbo, jumbo and wrangling that you guys are going to do to keep the money -- You know, because you want to keep the money there. My whole thing if they give me the money, is to take -- once you place it and actually give it to the people, actually give it to the people. I don't mean put it in their pockets, now. Actually give it to the people.

Q **All right. Now, did you -- I'm going to go back and do some of this other background stuff later.**
A Okay.
Q **But at some point in time, did you on behalf of Reach One Teach One -- were you recruited by MCI?**
A Johnny Ford called me at my house and told me he wanted me to meet with Attorney Tom

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DeBray.
Q **All right.**
A And that he wanted me to speak with them and join forces with MCI.
Q **All right. Now, when did Johnny Ford call you?**
A I have no idea, man. It was sometime in 2000 -- I met Mr. DeBray, 2004.
Q **All right. What part of 2004?**
A I don't know, man. I just don't know. You know, because it wasn't important to me like that.
Q **All right.**
A I have no idea. I just know we sat down in the Kellogg Center and talked to him about -- At first, you know, I told him he had to convince me that I wanted to do this. And what he told me they were trying to do, it sounded like a good deal. I said, "Okay. You know, I'll join you."
Q **So, the first contact was with Mayor Johnny -- Was he State Representative at the time, or was he the mayor?**

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A State representative. Well, it was in 2004. You don't know.
Q **I can't answer it. I have to ask you the questions.**
A I have no idea.
Q **All right.**
A It was Johnny Ford.
Q **Whatever his capacity was, he called you?**
A Yeah.
Q **All right. And so, your initial discussion was over the phone.**
A Yeah.
Q **All right. And Representative Ford told you that he wanted you to meet Tom DeBray.**
A Yeah.
Q **Had you even heard of Tom DeBray before then?**
A No.
Q **All right. And you met initially at the Kellogg Center --**
A Yes.
Q **-- on Tuskegee University's campus.**
A Yes.

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Q **Who was at that meeting?**
A My wife, Tom DeBray, and myself.
Q **Johnny Ford didn't show?**
A No.
Q **All right. So, how did you two know each other? How did you recognize each other?**
A Well, he told me what he would be wearing, and I told him what I would be driving and what I would be wearing.
Q **All right. So, you met him in the parking lot or outside?**
A I met him inside.
Q **So, then it wouldn't matter what you would be driving.**
A Well, if he was outside, I told him what I'd be in, what I'd be coming up in. You know, I gave him the full thing. It's not so much where I would be. I said I would be in a black ML320. I'm wearing such and such and such. So, if you're outside, that's what I'll be in. If you're inside, that's what I would be wearing.
Q **All right. So, you met him there?**

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A Yeah.
Q And about when was that? Let me ask you like this: How long after your conversation with Johnny Ford was it that you met with Tom DeBray?
A I have no idea. I don't know. Maybe a month. I don't know. Maybe a week, maybe two weeks. I don't know.
Q All right.
A It wasn't that important to me.
Q All right. And let me go back to your conversation with Johnny Ford. What did he say to you?
A He said, "Reverend Walker, I want you -- this guy you will be talking to, he's going to contact you. They're going to call you and ask you about getting with" -- I don't remember verbatim. "They want to talk to you about you joining your 501(c)(3) with them." And he said, you know, "You sit down. You listen to what they got to say, and you determine what you want to do." I said, "Okay." And I said, "What's it

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about?" And he said, "Well, he'll talk to you about it." Then he called me a couple of times, and I said, "Okay. We'll meet. We'll meet at the Kellogg Center." Then we sat down, and we talked. Then he told me what they were trying to do. And I said, "Well, that sounds like a good deal."
Q All right. Now, let me go back. You said he called you a couple of times. And when you said "he" --
A Tom DeBray.
Q Right. Now, let's go through the first time that he talked. What was that conversation concerning?
A Trying to set up an appointment.
Q All right. And about how long did you talk in that first conversation to try to schedule an appointment?
A Forty-five seconds.
Q All right. But you talked again before you actually met. So, what was that second conversation?
A We set a time and a date.

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Q Yes, sir. And then you met.
A Yes.
Q All right. Tell us about that conversation or about that meeting. You had stated a few moments ago that you and your wife and Mr. DeBray met.
A Well, basically, what he was talking about actually trying to recruit a bona fide 501(c)(3) that have been in function. You know, been in existence at least ten years.
Q Did he say that he had had any trouble locating or identifying 501(c)(3)s?
A He didn't tell us nothing. I wasn't interested in that, no.
Q Okay.
A And so, he just basically explained, you know, what they were trying to do, you know.
Q What did he say they were trying to do?
A With the bingo.
Q What did he say they were trying to do with the bingo?
A They were trying to get 501(c)(3)s to come on board. They could not do it unless they

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had a bona fide 501(c)(3).
Q Okay. Did he say they were just trying to get one or were they trying to get 501(c)(3)s there?
A Hold up. They were just trying to get me. He never told me about anybody else. He was just -- just him and I.
Q All right.
A So, him and my 501(c)(3).
Q Okay.
A So, that's all we talked about, me coming on with him.
Q All right.
A They never told me about who else, or whatever, who else is trying to do it, who won't do it or who will do it.
Q All right.
A We was talking about Reach One Teach One with him.
Q Okay. And about how long was that conversation?
A About maybe 40 minutes.
Q Did he tell you what benefit it would be for

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Reach One Teach One to join up with them?
A No. He threw out some nominal numbers, but he, you know, couldn't say. But we weren't really -- You know, we actually gave him ideas and other things, you know, that we were doing that would actually benefit that we're also actively involved with. And we told him, well, it sounds good, you know. And he never gave us -- you're going to make this amount of money or this amount of money, blah, blah, blah. Because, you know, we're not really so much as worried about the money. You know, but if it does come in, we're going to use it to the benefit of the community. But then we started telling him what he could actually -- if he didn't do the bingo thing -- to actually invest in that was good for the community and was good for the kids. Like the little -- We went to Washington D.C. And they had, like, a little go-cart.
Q **You're telling him this was an idea that you --**

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A Hold it. That's not --
Q **You're not saying that you and your wife and Tom DeBray then to Washington, D.C.?**
A No, no, no, no.
Q **Okay.**
A My wife and I. We travel.
Q **All right. So, this was something that you told him about.**
A Yeah. Hold it. I'll just cut this short.
Q **All right.**
A We just told him other things that they can do to make money other than bingo.
Q **All right. Did he seem receptive to that?**
A Yeah, he liked it. Oh, yes.
Q **Okay. Have you seen the results of any of your discussion with him as far as other ideas are concerned?**
A Well, no, because after that fact, I think -- after maybe -- He kept telling me that -- He said they were having trouble, and I said, "Okay. Whenever." And he kept telling me blah, blah, blah. And that they had raised the stakes from fifteen thousand

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($15,000) to two hundred and fifty thousand ($250,000). But it was all Greek to me. I didn't care. I said, "Well, okay. Whatever." Then they went on talking about the $15 million and all this. And I said, "Whatever." Because it wasn't important to me. I said, "So, whenever you're ready to go, it's good." But, you know, that's -- But then Mr. DeBray from him -- Then Greg Carr called me. And that's maybe a year between.
Q **All right. I was going to ask you because it sounds like you had several conversations with Mr. DeBray starting whenever it was in 2004 before Greg Carr. You said that it went up from one amount to another.**
A No, no, that was -- Oh, yeah. Yes.
Q **You said --**
A When he called me, and he said, "Well, you know, we're having trouble," blah, blah, blah, blah, blah. And I'd say, "Whatever."
Q **All right.**
A The conversation went -- it wasn't long. It

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wasn't long. See, I'm not interested in that part of it. I didn't care about that. Whenever you're going to use my 501(c)(3), that's what I'm worried about.
Q **Okay.**
A Once you roll with that, the conversation was 30 or 45 seconds. "Whenever. Tell me whenever you're ready to go."
Q **All right. So, now, at the time that you met him in 2004, did he, Tom DeBray, give any money to you? And when I say "you," I mean Reach One Teach One of America.**
A No.
Q **Okay. Or did he give any to you personally?**
A No.
Q **Okay. Or to your wife?**
A No.
Q **All right. And about when in 2004 do you think that was?**
A I have no idea, man.
Q **Was school in session at the university?**
A Yeah.
Q **All right. Was it football season?**

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A Yeah.
Q **All right.**
A All good, man. That's good. It was around November or December. That's right. Football due.
MR. GRAY: Football in Alabama triggers everything.
A Yeah.
Q **Okay. Off the record for a moment.**
(At which time, there was an off-the-record discussion.)
Q **So, it would have been November or December of 2004. So, would it be fair to say, then, that the first time anybody contacted you concerning using your 501(c)(3) for bingo purposes would have been November or December 2004?**
A Yeah, when they actually said the word "bingo." But Johnny contacted me first.
Q **All right. And when Johnny contacted you, it would have been maybe a month before then.**
A Yeah.

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Q **All right. All right. In the year 2004, let me -- I want to ask you some questions about Reach One Teach One of America.**
A Okay.
Q **Let's start in 2000. Do you have any records or any minutes or any notes or anything that will tell a person whose interested in knowing about Reach One Teach One of America what it did during any of those years? And when I say "what it did," I mean as far as scholarships that it gave out or children that it helped or anything like that.**
A No. All I did is I taped. We would tape. We've got a tape of it. That's the only thing I've got left, and I had it in my house. You know, I've got -- I had one of the tapes in the box, and I had one of the tapes at home. And I got -- my daughter has my car now, and I actually brought the tape and left it. So, I didn't know if you wanted to see it. But I've got a tape of when -- Because everybody we help, we tape

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them. We let them talk to us and how we correct it and say the things because we're working closely with -- I forgot his name. He's down in the United States Department of Agriculture. I work with him and with ADECA and with the man with the Community Actions here in Tuskegee.
Q **Yes, sir. So, you have a tape that will tell us --**
A Some things, yes.
Q **All right. And when was this tape recorded? Is this a cassette tape or a videotape?**
A VHS.
Q **Okay.**
A It's going to be anywhere between '98 to 2002 or '03, something like that.
Q **Yes, sir. All right. So, then let's --**
MR. GRAY, JR: If you would, counsel, we would like a copy of the tape.
MR. THOMAS: Okay. Do a discovery request.
MR. GRAY, JR: Well, we already have filed a discovery request.

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MR. THOMAS: For the tape?
THE WITNESS: For the tape?
MR. GRAY: For anything. It's broad enough to include the tape. You can check it and see. If not then...
A I don't think so because I don't think they knew I had it. And actually, I had to locate it.
Q **All right. Let me keep going for now, though.**
A Okay.
Q **Okay. So, that tape will cover individuals that you helped --**
A Yes, yes.
Q **-- for the period about 1998, you said?**
A To 2002. I'm not for sure. I'm not for sure which ones because there's two tapes. I'm not for sure.
Q **So, you have two tapes?**
A No. One burned in my car, now.
Q **All right.**
A One burned with the minutes, you know,

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because we -- We call this thing the "go and show." Whatever we did or completed, we would tape it. Most people take pictures and put them in a folder. Well, then, we would just take the camera and tape it.
Q **All right.**
A We'd tape the stuff.
Q **All right. For whatever years it is, it will tell because -- Well, let me ask you this question: As people would talk on the tape, would you ask them or would you state what the date was that they were actually doing the tape or giving the recording?**
A I don't think so.
Q **No?**
A No. But the fact that we're having it if that's what you want to know to see if we're legitimate. You know, it don't make a difference if we're actually helping them.
Q **Right.**
A There might be some names. We worked with some of the people. Some of them are still around. I think the guy in Shorter might be

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still around. We did some stuff with Mayor Powell.
Q **When you say "you think the guy in Shorter is still around," what are you referring to?**
A I wrote a 501(c)(3) for him. I write them.
Q **Would that have been you doing that --**
A I wrote them.
Q **-- or would that have been Reach One Teach One?**
A Well, Reach One Teach One does it, but, you know, my handwriting. You know, Reach One Teach One don't do anything. But under the auspices of Reach One Teach One, I write 501(c)(3)s.
Q **Here's what I'm trying to get you to testify to.**
A Okay.
Q **If a person wants to know what has Reach One Teach One done, then how can we find out? How can a person objectively determine whether or not your entity is legitimate and actually doing something furthering the purposes that are on its Articles of**

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Incorporation?
A Probably if I can go back to Mr. -- I can go down to the United States Department of Agriculture. I can go to Washington D.C.. I can go to your Community Actions. I can go to some of the people, Mrs. Willie Powell. I can go to -- Let's see. Even to your present Mayor now. Let's see. Who else? There are some students if we can find out where they are we can go and talk to them. Let's see. Reverend Milton, Doctor Milton, that was at -- where we can find him, Milton in Washington, that was at Butler Chapel.
Q **All right.**
A Okay. Let me see who else? My wife, she knows this. I should have her on speaker phone.
Q **She'll get an opportunity.**
A You don't want to tangle with her.
Q **All right. So, let's see. With respect to Mayor Willie Mae Powell in Shorter, what has Reach One Teach One done for citizens in Shorter or for the town of Shorter?**

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A She was trying to get a -- We wrote, like, a small scenario for her for -- for a building -- to justify being into a building. And the purpose of, you know, why they wanted to be in it or what is the purpose of it. You know, what's the advantageous thing. So, we actually just wrote it for her.
Q **When was that?**
A Man, probably '99. Might have been 2000. She should know.
Q **And what building are you referring to?**
A I don't know. You would have to ask her.
Q **Did you know at the time?**
A No.
Q **But you wrote a proposal for helping --**
A For the old building. You know, I don't have to see it. If you tell me that we have an old building back behind my house, and we want to blah, blah, blah, blah, blah, I don't need to go look at it. I would write and tell you what you want to -- You tell me what you'd want to use it for. I'll just

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write the purposes of it and what you're trying to do it for.
Q **All right. And so, now, is she or somebody from Shorter on this videotape that you're talking about?**
A No. We didn't get it of her, but she can substantiate that.
Q **All right. So, with respect to Community Actions, when you say "Community Actions," do you mean Macon Russell Community Action?**
A Macon Russell, right here in Tuskegee.
Q **Okay. Okay. The one where Mr. Jim Upshaw is the president, CEO?**
A I would imagine if he is in Macon County.
Q **All right. When did you do something -- When did Reach One Teach One do something for Community Action?**
A Well, there was several people couldn't pay light bills, gas bills, and we went there and actually wrote the money now.
Q **You went there and did what?**
A Get money for the people who couldn't get the lights paid and did not pay lights.

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Q **When did you do that?**
A I can't remember now. I don't remember. I just can't. It wasn't important then to keep dates of when I did this or did that.
Q **Right. Would it have been before this videotape that you had or after the videotape that you say was, perhaps, 2002, 2003?**
A Well, she's on it. So, I still couldn't tell you, but she's on it. The female we helped is on it. So, you know, you'll see her on it. But I can't remember.
Q **All right. Anything else that you've done as far as Community Action?**
A Well, at one time they said they didn't have no money, we wrote Washington. Washington said it wasn't true. They sent us to Montgomery, and Montgomery told us all the amount of money they're giving to Community Action. And we went back and told them what Washington said they had. So, that's how we got the female the money. I forget her name.

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Q **What year was that?**
A Oh, God, man, I don't know. See, you ask me that. Let me tell you something: If you ask me all the zillions of things I did and tell me what year, it wasn't important to me to keep up what year I did this, this, that, or did that. Actually, I'm getting of the age now where I forgot what I did yesterday.
Q **All right. Well, let me ask you about some of these others before you forget that.**
A Okay.
Q **With respect to Mayor Ford, you said that Reach One Teach One had done some things that he could tell us what you did to benefit the people.**
A Yeah. We were in the community, and he knew, you know, some of the things we're doing working with the college kids, writing for grants for the people in Montgomery. If I ever found Pell grants, you know, that we actually didn't know exist, and we wrote and called and talked to the people and had the kids actually put in for the grants.

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Q **Are those people on the tape that you had?**
A They might. But I know a female that we probably helped that might be still here.
Q **All right. When was that?**
A I don't know.
Q **All right. And you say she may still be here. Was she a student at the university?**
A Yeah. It was like before -- That might have been in 2000 because -- Yeah. She was a freshman. I would have to get my wife to find out what's the name.
Q **All right. And you say that Doctor Milton can also tell of some things that Reach One Teach One has done to assist people or things in furtherance of his purposes?**
A Yeah. Because we -- actually, we work with churches too. We write 501(c)(3)s and get the food -- to get -- to start food banks, getting money for that.
Q **He hadn't been in Tuskegee for over five or six years, has he?**
A Well, I think it's been going since ten years. And when I was standing in front of

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him, he was here.
Q **All right. Do you have anything in writing on anything that you did concerning for the chapel church --**
A No.
Q **-- or people that you assisted?**
A No.
Q **Now, for the year 2004, are you able to tell the Court specifically what Reach One Teach One of America, Inc., did in furtherance of its corporate purposes during that year?**
A 2004. Probably did a lot of things. I can't recollect, you know, one thing we did in 2004.
Q **What about for 2005?**
A 2005, we did. I would have to -- You know what? I wish I could put my wife on speaker phone because she --
MR. THOMAS: You can't do that.
A She knows. She keeps up with this stuff. I don't know.
MR. THOMAS: Answer to the best of your ability.

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Q **Would it be fair to say that your wife, who is the vice-president of Reach One Teach One of America, would be the one who would be most knowledgeable concerning the activities of Reach One Teach One?**
A No. She gives the clinic. And some things, she just remembers more than I do because they're not that important, you understand, other than just helping. See, the purpose of you is to try to find out if I'm legitimate. When I was doing it, I wasn't thinking that anybody would come back and say, well, you've got to remember what you did this day and remember what you did that day. Remember what you did this year, blah, blah, to prove that you are somebody or prove that you are legitimate.
No. All I know is I've got a 501(c)(3). We're legitimate. We've been working in the community, and you just have to draw it from there.
Q **All right. We don't have the names or specific instances other than what you've**

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able to --
A That's it. That's it.
Q **Okay. All right. What about for the year 2006?**
A No.
Q **When you say "no," what do you mean?**
A Other than what we did with the schools. Not with the schools, with the two day care centers, with the other small entities.
Q **All right. What did you do with the two day care centers in 2006? Strike that.**
What two day care centers did Reach One Teach One of America benefit?
A Little Treasures and Jessie Tatum's wife. I don't know what the name of her thing is.
Q **All right.**
A Do you know Jessie Tatum?
Q **Yes.**
A Okay.
Q **So, what did you do?**
A We gave them two thousand ($2,000) dollars each.
Q **All right. That's in 2006?**

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A That's in March, in March.
Q **Oh, that's this same money?**
A Yes, same money.
Q **This money returned is the two thousand ($2,000) dollars?**
A Yes, yes, yes.
Q **So, really you didn't do anything because all the money was returned; is that correct?**
A No. I just said I gave them the money. See, your mind is boggled up with school. I said Little Treasures Day Care Center.
Q **Did Little Treasures Day Care Center negotiate the check that was given to it?**
A They kept the check. They spent it.
Q **All right. Okay. And what about the other day care center?**
A They spent it.
Q **All right. Now, did you take a picture giving them any money?**
A Yeah. You saw it in the paper.
Q **You did take a picture?**
A Yes. You saw it in the paper.
Q **So, you thought it was important at that**

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time so that people would know that you did that?
A Any time you do anything with a 501(c)(3), you do it with paperwork or you promulgate it in the papers. Even if I did -- if I never got one from anybody, whatever money I get, they do it. You know, you see the big checks when they do it in all the papers, the 501(c)(3)s that they're giving money.
Q So, then, in 2005, what did you do in 2005 that's in the newspaper?
A Nothing.
Q Nothing?
A Uh-uh (negative response).
Q 2004, is there anything that would show us such as newspaper articles or newspaper pictures where Reach One Teach One is doing something for some people that it said was --
A Yeah, well --
Q -- created to help?
A 2003, 2004, you might check the Tuskegee News because I think we did that other than

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taking the pictures. You know, it's -- it's the nonprofit prerogative whether they promulgate it that way or actually just keep a record of it. But I do it regardless, you know, or try to actually show the public what's happening.
Q All right. Now, let's move on to bingo. Do you have or does Reach One Teach One have any experience in operating a bingo facility?
A No, we haven't.
Q All right. But you're familiar with Macon County Greyhound Park, aren't you?
A Yes.
Q And Victoryland?
A Yeah.
Q Have you ever been to Victoryland?
A No.
Q Never been?
A No.
Q All right. Do you know whether your wife has ever been?
A No.

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Q It's odd to hear a person from Macon County say they have never been. Why haven't you been?
A I have no need to gamble.
Q Okay. So, you haven't been to Victoryland because you have no need to gamble?
A That's exactly right.
Q All right. Do you have any religious objection to other people gambling?
A No, I don't. I don't. That's prejudging people. You know, like I just told you, and I gave you the scriptures to support it.
Q Okay.
A You know, whatever they do, you know, let God judge them, not me.
Q Okay. You did call it a sin, though.
A Well, because God calls it a sin.
Q That wouldn't be prejudging.
A Well, I'm not -- Let God be the judge. That's James 4:10.
Q Now, what is "Be Ye Holy Ministries."
A Be Ye Wholly Ministries is a compactor of -- which I preach from. And that started from

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Leviticus 20:7 when God said, "Be ye holy for I am holy."
Q Uh-huh (positive response).
A So, in order -- if you look at my -- all the things we do, we do also preaching. We go and preach at certain places. And when we preach, they call us under "Be Ye Holy Ministries."
Q All right. Is that a part of Reach One Teach One of America?
A It's a compactor, but it's not -- it's just like a subdivision. It's not bona fide 501(c)(3). It's just a ministry.
Q All right. Let me ask you this question about Reach One Teach One of America. Who are your current officers?
A My wife.
Q And what's her position?
A She's the vice-president, which is also equals treasurer.
Q Okay. Vice-president and treasurer?
A They're the same thing. The vice-president is always the treasurer. Me, president.

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And I'm not trying to be smart.
Q **No.**
A I'm just letting you know what happens.
Q **Yeah. Very few things are always true, and that's something that not always true.**
A Okay.
Q **But go ahead. You're the president?**
A Yes.
Q **All right. And do you have a secretary?**
A Yeah, we had Jackie Walker.
Q **Is she the secretary now?**
A Well, we're looking for a new one because, you know, we haven't -- It's just me and Cornelia because we're actually doing all the work. So, Cornelia has been the secretary. And by the 501(c)(3), one person can do two things. So, she's the vice-president, treasurer and secretary.
Q **All right. So, was there -- Did that action occur at your last corporate meeting?**
A Yeah.
Q **All right. And when was that meeting?**
A I actually just did that. We are working in

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that capacity. It's been a week ago.
Q **A week ago?**
A Yeah, a week ago.
Q **Okay.**
A Because I can't remember a time.
Q **Was there a notice of that meeting of the board of directors that was --**
A I don't have to do that.
Q **No, I'm just asking. Was there?**
A No.
Q **And is it at that point that -- It's at that meeting that Jackie Walker was replaced as secretary?**
A Yeah. Well, what I did what I thought would be sufficient since my wife and I actually had been the ones that were doing all the footwork. You know, most of the time they were actually too busy. With the annual meetings that we were having, you know, a lot of people couldn't make it. So, we said for right now since we know all -- they're not really familiar with what's been happening that was just actually bona fide.

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Let's say it was just you and I, and you'd be the treasurer and the secretary until we get a third person. I had planned on talking to her, but I can't catch her. And see, you know, if not, you know, I'll get -- Oh, I'm sorry. Duh, duh, duh, duh, duh, duh. My wife got Ollie McMillan. I'm sorry, man.
Q **As the secretary?**
A Yeah.
Q **Ollie McMillan, did you say the name was?**
A We haven't confirmed her yet.
Q **Okay.**
A We're waiting to pull Jackie off. That's what we were going to do.
Q **All right. And this happened last week?**
A Yeah. We talked to her -- it must have been last weekend.
Q **All right.**
A Because I'm getting ready to write up a 501(c)(3) for her.
Q **Was Ollie McMillan at this meeting where she became the secretary?**

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A No. We spoke to her and told her. My wife, Ollie, and myself. Yes, you know, we told her we were actually going to set up a meeting, could she handle it. She said, "No problem." I told her the next board meeting, what we're going to do, we're going to actually set her in.
Q **Now, when is that next board meeting?**
A Whenever I call it. That will be a special board meeting.
Q **All right. And do you have minutes from this past board meeting when she was --**
A No.
Q **-- named the secretary? Or has she not been named the secretary?**
A I just said that. She hasn't been named yet.
Q **I'm sorry. I need to go back again and determine who your officers are.**
A I just told you. It's my wife and me, and she's the treasurer and secretary.
Q **And vice-president.**
A And vice-president. She can hold two

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positions.
Q **That would be three, wouldn't it?**
A No, it would not.
Q **All right.**
A The vice-president and the treasurer is basically the same person. The secretary is one. You've got president; vice-president, who is the treasurer; and then the secretary. I keep saying this.
Q **It's your testimony, then, sir, that the vice-president and treasurer serve the same functions?**
A Unless I change it. Then if I have a chairperson, I become the founder or CEO for the chairperson, then vice-president.
Q **All right. Now, is Reach One Teach One of America qualified to do business in the State of Alabama?**
A Yes.
Q **Is Reach One Teach One -- is it qualified to do business anywhere else?**
A It's qualified to do business anywhere in the United States.

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Q **All right. Do you file any kind of a document with states when you anticipate doing business there?**
A Yes, you do.
Q **I'm asking do you.**
A Yes, I do.
Q **Okay.**
A And I have.
Q **And you've done that in Florida?**
A No. Only in Georgia.
Q **All right. And in Georgia, hasn't that been dissolved, that corporation?**
A No. It's not dissolved. You know, I haven't been working the Georgia area. I've actually been the Reach One Teach One because all it did to bring it back up is fifteen ($15) dollars.
Q **Okay. And have you done that?**
A No.
Q **Okay.**
A It's still my prerogative.
Q **Now, are you familiar with the -- you know Nadine Johnson?**

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A No.
Q **No?**
A Uh-uh (negative response).
Q **Have you ever heard of Nadine Johnson?**
A No.
Q **Does anybody live at the house with you -- Now, who lives at 410 Victory Garden Drive in Tallahassee?**
A Oh, that's where my wife lives.
Q **Okay. Anybody else live there?**
A My wife and Andrenica is there.
Q **Okay. Anybody else?**
A No.
Q **Okay.**
A Who's Nadine Johnson?
MS. JONES: Let him ask the questions.
A I have no idea who that is.
Q **Okay.**
A Why would you ask me that?
Q **And you live there as well, right?**
A Yes.
Q **Okay. Do you know Mr. Nathan D. Zeigler?**
A Uh-uh (negative response).

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Q **Never heard of him?**
A I might have met him. I don't remember the name. Nathan D. Zeigler, Zeigler, Zeigler.
Q **Stockbridge, Georgia.**
A You've got my Georgia incorporation.
Q **Right.**
A Now, you're getting it. Yeah, okay. Yeah, I know him.
Q **Who is he?**
A That's the one from Georgia. Nathan T. Zeigler, Nadine, and myself. Yeah, okay. So, you've got the corporation out of Georgia.
Q **All right. So, now who is Nadine?**
A Okay. I don't remember. I think Nadine is his -- might be his wife. Zeigler triggered it. But the only thing to start that up, all I got to do is take fifteen ($15.00) dollars, and that's back in full force. Yes, she did. Yes, she did. Correction. Correction. Okay. See, it's coming to my mind. You know, hey, I'm old. I can't remember all that way back then.

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Q Right. And we do want the record to be clear. So, is that something that you have testified to during this deposition, that now that you have had a chance to think about it, you may have given some erroneous information?
A I would not call it erroneous. I don't remember.
Q Well, some wrong information?
A Well, you can call it wrong, whatever you say.
Q Something you want to correct?
A Okay. Now, we're straight with it.
Q Okay.
A Yeah, my wife, we did -- she filed with Reach One Teach One in Tallahassee.
Q Who did that?
A Well, let's say I did because I paid the money. It was seventy-eight ($78) dollars to do so. Fifteen ($15) dollars in Georgia. Seventy-eight ($78) in -- but I haven't filed with the other people.
MR. GRAY: Excuse me.

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(At which time, a recess was taken.)
Q Sir, let me just be clear about the offices of Reach One Teach One of America, Inc. You currently have -- is it two officers?
A Now, currently, yes.
Q And that's you and your wife.
A My wife right now.
Q All right.
A Until we have the special meeting and put Ollie in.
Q Is there some meeting at which your past secretary -- or is there some meeting at which Jackie Walker was relieved of her duties as secretary?
A Yeah.
Q Yes?
A Yes.
Q When was that meeting?
A I told you a week ago. Sometime a week. I don't remember. I can get the papers for you.
Q All right.

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MR. GRAY, JR: If you will get that, Counselor, and we would greatly appreciate it since we have requested all minutes of Reach One Teach One America, Inc.
Q Now, when was the fire? You talked about the fire on --
A I told you August 9th, 2004.
Q 2004. So, your entity has met since then, has it not?
A My wife and I.
Q All right. Okay. And you're still having annual meetings, are you not?
A Uh-huh (positive response).
Q When I say "you," I mean Reach One Teach One of America, Inc. And I may just call it Reach One Teach One, if that's okay.
A It's Reach One Teach One, yeah.
Q All right. So, when was your corporate meeting in 2004? What month was it in?
A 2004 is the month we left. Let's see. We went in August, so we did it in -- We always do it at the end of the year, December 31st.

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Q December 31st?
A Uh-huh (positive response).
Q All right. So, then, since the fire was before December 31st, you should have minutes for 2004.
A 2004, uh-huh (positive response).
Q All right. And so, you have those minutes isn't that right?
A My wife has them.
Q All right. And for the year 2005 --
A My wife has them.
Q -- you have those minutes.
A Uh-huh (positive response).
Q All right. You will furnish those for us.
A I can get it.
Q All right. And for the year 2006, have you met yet?
A Well, it ain't December 31st yet.
Q All right. I thought I understood you to say that you met about a week ago.
A No, that was a special meeting. That was a special meeting.
Q Was it a meeting of your board?

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A Yeah.
Q All right.
A Yeah, but it's a special meeting. Listen, now. Let me clarify this again so you don't be redundant.
Q It's clear.
A Okay. All right.
Q You met a week ago.
A Okay. All right.
MR. GRAY: And those minutes you want to. Comes all the minutes since the fire.
A That's not a problem.
Q All right. Now, has Nadine Johnson ever been a secretary of your -- of Reach One Teach One?
A In Georgia. In Georgia. Don't you look at the papers in Georgia?
Q When was she the secretary? During what years or what months?
A I have no idea. Whatever it says on that piece of paper. You read it and tell me.
Q All right. Let me ask you something you can

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tell me about.
A Okay. Good.
Q In March 2006, you received from -- Did you receive -- Let me ask you this because I want to be right. I want to make sure I understand right. Did Reach One Teach One receive a check from Macon County Investments, Inc. --
A Yes.
Q -- in 2006?
A Yes.
Q All right. So, it was not a check from Frank Thomas --
A No.
Q -- but from Macon County Investments, Inc.; is that correct?
A Yes.
Q All right. And what bank was that check written on?
A Maxwell Air Force Base Credit Union that it was deposited into.
Q So, who signed that check?
A I did.

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Q You may not have understood my question, or I may have not have asked you what I thought I asked you. What I'm asking is whether the corporation of which Frank Thomas is the president, Macon County Investments, did that corporation write a check to Reach One Teach One of America?
A I'm under the understanding that it did. The money was there.
Q You're saying you're under the understanding. So, you physically received a check from Macon County Investments; is that correct?
A No.
Q Who received the check?
A Maxwell Air Force Base Credit Union.
Q Would that have been before this March 31st, 2006?
A Yes.
Q All right. So, did they just deposit the money into your account; is that what happened?
A Yes.

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Q Yes?
A Yes.
Q So, you never saw the check.
A No.
Q So, then, do you know for a fact that it was Macon County Investments?
A I just know for a fact that's what he told me it was.
Q All right. So, Frank Thomas told you that Macon County Investments gave Reach One that money.
A Yes.
Q All right. And the money did not come from Frank Thomas.
A Not to my knowledge.
Q All right. Now, does Reach One receive monthly or quarterly statements from Maxwell/Gunter Credit Union? What's the name of it? What's the official name of it?
A Yeah. It's Maxwell -- Well, over at Gunter it's Maxwell/Gunter because of an extension of Maxwell Air Force Base. It's Maxwell Air Force Base Credit Union.

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Q **All right. And you receive a monthly statement?**
A I think it's every quarter.
Q **Quarterly? All right. So, then the quarterly statement that would follow that particular date would have that deposit?**
A It should.
Q **And would it have a copy of the check?**
A I'm pretty sure they would.
Q **All right. And what was the amount of that check?**
A Ten thousand, five hundred ($10,500).
Q **All right. And of that ten thousand, five hundred ($10,500) you attempted to distribute -- As a matter of fact, you did deliver some checks.**
A Yes.
Q **All right. And you delivered how much?**
A Ten thousand ($10,000).
Q **Delivered ten thousand (10,000) dollars.**
A Uh-huh (positive response).
Q **Two thousand ($2,000) for three of the public schools in Macon County?**

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A No.
Q **Not two thousand ($2,000) each?**
A You've got the letter where the public schools gave the money back.
Q **Yeah, and you said no. So, I'm asking you isn't it true that you did checks for three schools in Macon County --**
A Yes, yes.
Q **-- in the sum of two thousand ($2,000) dollars each?**
A Yes. That's yes.
Q **All right. And you also did some other checks.**
A Yes.
Q **Was it at the same time, or was it later?**
A Same time.
Q **All right. And one was for Little Treasures Day Care?**
A Uh-huh (positive response).
Q **Is that yes?**
A Yes.
Q **And the other was for another day care.**
A Yes.

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Q **Whose name you can't recall right now.**
A Jessie Tatum's wife.
Q **All right. But you just can't remember the name right now.**
THE WITNESS: Do you know her? She's right down there next to the --
MR. GRAY, JR: He's further away than you from having the child in day care.
MR. GRAY: He can tell you more about day care than I can.
A It's right down there on the Montgomery Highway right across from Bibb Street.
Q **I'm just trying to get you to tell us. That's all.**
A What's the name of that? Do you remember that?
Q **That's what I'm asking you.**
A I don't know.
Q **That's okay. But as far as that, you wrote a check for two thousand ($2,000) dollars to that day care.**
A Uh-huh (positive response).

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Q **All right. Yes?**
A Yes.
Q **Okay. And you didn't get that check back. They spent it.**
A Yes.
Q **All right. Now, with respect to the six thousand ($6,000) dollars because you did get three checks back, right?**
A Yes.
Q **All right. Now, with that money, it went back to Frank Thomas.**
A And why they did it, I have no idea.
Q **All right. Did Frank Thomas -- Did Macon County Investments then deposit that back into your account?**
A Exactly. Yes.
Q **All right. So then, Reach One Teach One benefitted to the tune of six thousand, five hundred ($6,500) dollars; is that correct?**
A They redeposited six thousand ($6,000).
Q **All right. So, of that ten thousand, five hundred ($10,500) dollars, four thousand ($4,000) was distributed to day cares and**

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six thousand, five hundred ($6,500) went to Reach One Teach One; is that correct?
A No. How did you get that? The money was redistributed.
Q **All right.**
A Let me --
Q **To whom did Reach One redistribute it?**
A Okay. Of the three checks, we gave it to Macon County -- I gave Frank the name.
THE WITNESS: Frank, can you remember the name? Macon County --
MS. JONES: Just answer the questions the best you can remember.
A It was Macon County -- the one that Charlie T. is over, the Little Treasures Day Care, Jessie Tatum's wife, and we have got -- There's an instrument we wanted in Tallahassee. We gave it to Tallahassee -- Reach One Teach One, Tallahassee.
Q **All right. So, you gave --**
A That's ten thousand ($10,000) dollars, brother.
Q **I don't count it that way. So, let's see.**

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You gave two thousand ($2,000) to Little Treasures.
A Uh-huh (positive response).
Q **You gave to two thousand ($2,000) to Jessie Tatum's day care.**
A Yes.
Q **All right. And the remaining sixty-five hundred ($6,500) that came back, you gave two thousand ($2,000) to some entity that you say --**
A Macon County -- We can go to the newspaper because I can't remember the names. They were the ones that came through, and I redistributed that six thousand ($6,000) dollars to them.
Q **What's the name of the entity to whom you redistributed?**
A Macon County Road something -- whoever Charlie T. is with. I don't know. Maybe Greg has got it because I wrote it all down and gave it to Frank.
Q **All right.**
A I mean, all the money was spent. Oh, I tell

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you what? I can go back to Maxwell and find out, you know, each name of those.
Q **If you would, please.**
A That is not a problem.
Q **If you would, please, because what I see thus far is four thousand ($4,000) dollars distributed, and six thousand, five hundred ($6,500) dollars in the account of Reach One Teach One not being distributed.**
A You're not listening again because I gave you more than that. I gave you more names than, you know, the six thousand ($6,000) dollars that came back.
Q **All right. If you're able at some point to come up with these names --**
A It's not a problem.
Q **-- please let me know.**
A It's not a problem.
Q **Is there an entity called -- that you're involved with called C-O-L-O-R-S?**
A COLORS.
Q **Is that an acronym?**
A COLORS, Children of the Lord's Organization

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Responding Spiritual. That's one I wrote for my daughter. She's a compactor of mine.
Q **She's a what?**
A You know, being under me, compactor.
Q **Compactor?**
A That's what I call it. Let's say -- I'll use the word, she's under my umbrella. You understand now?
Q **So, this COLORS, is that also a tax exempt organization?**
A No, no. She's just under me.
Q **What is it?**
A It's a thing that my daughter uses. My daughter wants to go out in the community wherever she is and help the kids and help with tutoring and what they call night lash kids and things like that, and out with the churches and the old people and help them with food. So, I said, "Well, you can't do that. You need some type of auspice to do that." So, I wrote Children's of the Lord's Organization Responding Spiritually, which is COLORS, and actually wrote her

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everything. I haven't got it incorporated, but I just told her, if we get money, then I can also put it down to her, and she can go out in the community.
Q **Which daughter is that?**
A That is Y'Jori.
Q **Does Reach One Teach One have any bank accounts other than the one at Maxwell Air Force Credit Union?**
A Yes.
Q **And where are they?**
A There's one in Tallahassee.
Q **At what bank in Tallahassee?**
A Florida Commerce.
Q **Approximately how much money does Reach One have in the bank at Florida Commerce in Tallahassee, Florida?**
A Now?
Q **Now.**
A Probably a negative two ($2) or three ($3) dollars.
Q **All right. Let's say in July of 2006, how much did it have?**

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A I'd have to check it. Maybe two thousand ($2,000), maybe.
Q **Maybe two thousand ($2,000) dollars?**
A Uh-huh (positive response). Maybe.
Q **All right. And what happened -- You say in July -- last month it had two thousand ($2,000) dollars.**
A Oh, last month of July. Oh, man, my head -- No, no, it didn't have that.
Q **How much did it have in there last month?**
A I have no idea. You know what I need to do? I need to go back to the records. If you want to see them, I'll just ask Reatha to print them for me and just give them to you and let you look at them.
Q **Approximately how much would you say it had?**
A In July?
Q **Right. Last month.**
A Oh, last month? Yeah, minus two ($2) dollars. I just said that.
Q **Okay. Well, let me -- I'm trying to get to a point in time when it had more than minus two ($2) dollars.**

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A It's been up to ten ($10,000) or fifteen ($15,000) dollars.
Q **All right. So, let's go back to January of 2006 and let me ask about Reach One Teach One in Florida. In your account in Florida, how much money, if any, did Reach One Teach One have in its bank account in January 2006?**
A Maybe five ($500), six ($600) to twelve hundred ($1,200) dollars.
Q **Twelve hundred ($1,200) dollars?**
A Maybe. I'm not for sure. I can't. You know, I just don't keep up with things like that.
Q **What has Reach One Teach One done in Florida in furtherance of its corporate purpose?**
A But what would that have to do with Macon County?
Q **I'm asking you a question.**
A But I don't understand why what I do in Florida has to do with you here in Alabama.
Q **Everything Reach One Teach One does or claims to do is important to this lawsuit.**

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A Oh, I see what you're saying.
Q **Thus far, we haven't seen anything other than two pictures that you've told us about, four thousand ($4,000) dollars. And since you've just told me that you had twelve hundred ($1,200) dollars in January, maybe you had twelve hundred ($1,200) --**
A Maybe.
Q **-- and now you have negative two ($2) dollars, then we're trying to find out whether this went to help any people in accordance with your corporate purposes as set forth in your articles.**
A Yes, we have.
Q **Well, that's what I'm asking.**
A Yes, we do, and, yes, we have.
Q **Okay. What?**
A We help people with the lights. We help people with -- if the kids need clothing, if the kids need shoes.
Q **Do you have any written documentation of Reach One Teach One doing anything along those lines in the year 2006?**

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A Other than our minutes. My wife would have that. Other than I can just produce the people.
Q All right. Do you have any other bank accounts other than the one at Maxwell Air Force Credit Union and at the bank that you just identified in Tallahassee?
A No.
Q Okay. Earlier this year at Maxwell, let's just say in January 2006, did you have anything in the account?
A Uh-uh (negative response).
Q Nothing?
A Uh-uh (negative response).
Q All right. Before Macon County Investments deposited the money in your account, when was the last time there was money in Reach One Teach One's account at Maxwell?
A Probably not in several years. Probably even longer than that.
Q Several years?
A Uh-uh (negative response).
Q Okay. Has it ever had any money in it?

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A It has.
Q Other than that which it initially started with?
A Yeah, but, see, that's the reason I'm not doing 990s. To substantiate a 501(c)(3), you don't need to put money in the bank to say you're doing something to people or giving money. 501(c)(3) and charitable organizations does not deal with how much money you have in the bank. It's a service to the community.
So, since -- Why would I put the money in the bank when I'm getting money for people. I don't need to. So, when I get a charitable scholarship, I don't have to have money in the bank to give them a scholarship of money. That don't make sense to me.
Q Okay. And where can we read about you having given a kid a scholarship?
A Well, I don't know where you --
Q That's what I've been asking about, sir.
A It doesn't matter. You know, we know we did it, you know. So, whatever comes of this,

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however it is, it doesn't matter.
Q All right. Are there any records that bear that out?
A Other than, well, no they were burnt. No, no, we don't.
Q All right.
A But you don't have to have money in the bank, you know, to rectify that you're a charitable organization.
Q No. I was asking about things that you had done?
A Oh, okay. I thought you were asking about money.
Q I'll show you what's been marked as be Defendant's Exhibit Ten.
(At which time, the referred-to document was marked as Defendant's Exhibit No. 10 by the Reporter.)
Q Is that a two-page document?
A Yes.
Q All right. You have before you Defendant's Exhibit 10.

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A Okay.
Q All right. Can you identify that document, sir?
A Yes, I can.
Q What is it?
A It's a request to establish myself in Georgia.
Q All right. And did you file this in Georgia, you say?
A This is -- This is Georgia.
Q Okay. And when did you file this document?
A It says July 1, 1998.
Q It does?
A Yes.
MS. JONES: You have a different -- You gave us Florida, but he has Georgia.
MR. THOMAS: You marked that ten.
Q You've got Georgia?
A It's Georgia. Man, you see Georgia right there?
Q Yeah. You're right. That's what I'm going to talk about.

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A So, you want me to take Georgia now?
Q **You have Georgia.**
A This says GA. That's Georgia.
Q **Right. You have Georgia.**
A You have Georgia, and he had Florida.
Q **Right.**
MR. THOMAS: So, he's going to get Georgia.
MR. GRAY: Now, he's going to get Georgia if we can find it. I wanted to talk about Florida.
(At which time, the referred-to document was marked as Plaintiff's Exhibit No. 11 by the Reporter.)
Q **I show you what's been marked as Defendant's Exhibit 11.**
MR. GRAY: You marked it as 11?
MR. GRAY, JR: Yes, sir.
Q **Do you recognize that document?**
A Yes, I do.
Q **What is it?**
A It's for me to do business. It's actually

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registering my 501(c)(3) in Florida.
Q **And when did you file this?**
A If there's no date on it, I won't be able to tell you. January 6th, '05.
Q **Yes, sir. Now, under the name and street address of Florida registered agent, are you the registered agent?**
A Yes.
Q **And 410 Victory Garden Drive is your office address?**
A Yes.
Q **That's also your home address?**
A Yes, apartment.
Q **Right. Or your apartment address?**
A Uh-huh (positive response).
Q **Now, to the left of it, it looks like another name. What is that name?**
A I have no idea.
Q **N-I-C-A Walker.**
A I don't know why they put Nica Walker there.
Q **Okay.**
A You wrote that, didn't you? Did you write that? Well, you tell me why would the

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people in Florida right Nica Walker next to my --
Q **Well, that's your policy.**
A You wrote that, man.
Q **Sir, who completed this application?**
A The person that signed it, me.
Q **That's you?**
A Uh-huh (positive response).
Q **All right. So, then the handwriting that's on this document, this is your handwriting?**
A That's my handwriting.
Q **All right. Starting at Reach One Teach One of America, Inc., is that your handwriting?**
A Uh-huh (positive response).
Q **Is that a yes?**
A Yes.
Q **And the state or country --**
A All of it.
Q **All of it.**
A Except for Nica Walker.
Q **You didn't write that?**
A No. You wrote that.
Q **I didn't write that, sir.**

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A Okay.
Q **All right. On the next page.**
A Okay.
Q **Secretary is Nadine Johnson. Do you recognize that -- Is that your writing as well?**
A Yeah, but I have no idea who Nadine -- Oh, yes, I do. Nadine Johnson is my wife's first cousin. I'm sorry, baby. I can't remember. I'm old.
Q **All right. And Nadine Johnson is the secretary and treasurer according to your application for your organization to conduct affairs in Florida; is that correct?**
A How would Nadine be the secretary and treasurer when her states clearly secretary? You reading the same document I'm reading?
Q **Sir --**
A Secretary Nadine Johnson.
Q **Sir, you really should not be so arrogant. Look at this line.**
A Well, I don't --
Q **What's the name on this line? Does it say**

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secretary?
A Well, that's wrong.
Q It says secretary.
A That's a mistake.
Q Well, is this secretary?
A That says secretary.
Q And who is the name next to the secretary?
A Nadine Johnson.
Q Is this treasurer?
A That's treasurer, but that's a mistake.
Q Who is the name next to the treasurer.
A That's a mistake.
Q What's the name?
A Nadine Johnson.
Q All right.
A But that's wrong. The treasurer is Mrs. Walker, so I made the mistake.
Q Okay.
A She is not the treasurer.
Q But you told Florida that she was.
A Well, I would have to go back and correct it.
MR. GRAY, JR: We offer Defendant's 11.

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MR. THOMAS: I don't have any objection. That's 11?
THE REPORTER: Yes.
Q All right. So, you filed an application to conduct business in Florida as indicated in Defendant's Exhibit 11; is that correct?
A Uh-huh (positive response).
Q All right. Did you receive anything from the State of Florida that granted that application?
A Yeah.
Q All right. No problems with that; is that correct?
A No problems.
Q Okay. And so, from January -- Is that when you first started doing business in Florida, January of 2005?
A Well, that's when I initiated it. I actually didn't start really doing -- you know, start doing anything for -- I think I was able to get a little cash. I'd have to go back. I can tell you what I did when I sit up and look at my financial reports or

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go back with my wife and talk with her and, you know, get the minutes.
Q Okay. So, is there anything in writing for the year 2005 that shows what Reach One Teach One of America did in furtherance of its nonprofit purposes in Florida?
A Uh-huh (positive response).
Q There is something?
A Uh-huh (positive response).
Q And what is that document?
A You mean, for what we did?
Q Yes. Tell us what you did.
A Well, just the minutes, you know, who we helping.
Q Okay. I show you what's been marked as Defendant's Exhibit Ten. What is that document, sir?
A This is the one from Georgia.
Q All right. Same kind of form?
A Well, basically.
Q All right. And what's the date it was filed?
A July 1998.

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Q July 1998?
A July 1, 1998.
Q All right. And who are the officers at that time?
A It was Pastor James Brooks, Cornelia, and myself.
Q All right. And who is Pastor James Brooks?
A Pastor James Brooks is the guy that actually established a food bank for his church.
Q Is there anything in writing that would show what Reach One Teach One did to benefit either his church or anyone else during the time period that you were doing business in Georgia?
A Well, he's not the pastor now, but I can probably try to get in touch with him in Georgia to find out if he has any other documents.
Q All right. Do you have anything in writing -- Does your corporation have anything in writing that tells what you have done or that you did?
A The stuff that we did, he had, Pastor Brooks

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had.
Q **What's the name of the church?**
A It's a Lutheran church. I forget the name of it. It's just Lutheran.
Q **Is it the only Lutheran church in Lawrenceville, Georgia?**
A It's not in Lawrenceville. It's in Columbus, Georgia.
Q **Columbus? Okay. Is it the only Lutheran church in Columbus, Georgia?**
A I don't know how many Lutheran churches are in Columbus, Georgia. He had a Lutheran church in Columbus, Georgia.
Q **Okay.**
A But he lived in Lawrenceville, so we used that particular address.
Q **All right. At that time, did you live in Columbus, Georgia?**
A No.
Q **Did you use the Columbus, Georgia, address for this purpose?**
A Yes, yes.
Q **For what purpose?**

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A For the 501(c)(3) of the church.
Q **All right. I think I asked -- I know that I asked you about bank accounts --**
A You sure did.
Q **-- in Alabama and Florida. Does Reach One Teach One currently have a bank account in the State of Georgia?**
A No.
Q **Have you ever had a bank account in the State of Georgia?**
A No.
Q **Has it ever had any other bank accounts other than the two that you have --**
A No.
Q **-- mentioned earlier? Does Reach One Teach One have any assets?**
A Now?
Q **Now.**
A No.
Q **Did it have any assets in January of 2006?**
A Assets?
Q **Anything.**
A Buildings, cars?

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Q **Buildings, cars, personal property, real property, money in the bank, CDs, stocks?**
A No, no, we can't do that. What we did I had -- What I did is -- have given several cars away, vehicles.
Q **From Reach One Teach One?**
A From Reach One Teach One for people who needed cars to go to work.
Q **All right. When is the time most recently that you did that?**
A Oh, man. Let's see. '98, 2001. Well, we're getting ready to give away one now. But I can't recollect. You know, it's one -- they're on the tape. I know one of the females I gave -- a couple I gave cars to are on the tape.
Q **On the tape.**
A Yeah.
Q **All right. So, this would be something that happened before 2002 or 2003.**
A Well, some of them I did in Alabama and in Georgia. Because right now, I got a '98 Mercedes and four or five other cars, and I

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just give them. You know, I give them away.
Q **All right. But there's nothing in writing, though. So, there's nothing on that tape that's going to show us anything --**
A Yes, yes.
Q **-- post 2003. I mean, after 2003.**
A I'd have to look at it, man. I know one we did 1996 to whatever this one started. Then we had the other one. I don't know. I'd have to look at it. I really don't know. And I have -- my TV has where the time, date stamp on it, so I'd have to put it into my TV and find out what the time date stamped on it.
Q **All right. Now, on these cars that you're getting ready to give away, are these cars titled in -- Well, you say you're getting ready to give one particular one away.**
A Uh-huh (positive response).
Q **All right. What car is it that you're getting ready to give away?**
A Well, this might be a Plymouth Breeze. And the procedures I use, actually, when it's my

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vehicle --
Q **All right. Let me ask you this question.**
A Okay.
Q **Right now, in whose name is the car titled?**
A To me.
Q **Not Reach One Teach One?**
A Yeah. I can't give it away from me. I have to put it in Reach One Teach One's name then pass it on.
Q **So, does Reach One Teach One own any cars right now?**
A No.
Q **What is the -- What is the reason that you go through Reach One Teach One to give away a car?**
A Well, it's the same way that Frank gives me money to give to you. So, if I have something, I put it into the Reach One Teach One name that it may benefit from the Reach One Teach One. If I give the car, my name is Walter Walker, then Reach One Teach One wouldn't have given it, Walter Walker would have. So, in order to relinquish that, I

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put the car in Reach One Teach One's name, take it to the particular -- find a person who actually needs the car and just title the car. The car is titled. It was titled a gift.
Q **All right. And that benefits you with your tax returns per year?**
A No, man. You crazy? No. How is it going to do that when I'm giving it from a 990 and I do a 1040?
Q **All right. So, does it benefit you, the individual, at all as far as your taxes are concerned?**
A How can it?
Q **Just say yes or no.**
A It's no.
Q **Okay. And does it benefit Reach One Teach One?**
A No, it doesn't benefit anybody. It's just giving it away. How is it a benefit?
Q **All right. Now, how many times has Reach One Teach One given a car away to a person that needed one?**

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A It's probably the third time.
Q **All right. When was the last time you did it?**
A Probably 2000.
Q **And to whom did you give a car in the year 2000?**
A I do not remember. I forget my children's names. So, I have no idea.
Q **All right. And where did Reach One Teach One deliver the Car?**
A Right down here off Montgomery Highway.
Q **Tuskegee?**
A Uh-huh (positive response).
Q **Does Reach One Teach One have a corporate headquarters?**
A Uh-huh (positive response), yeah.
Q **What is it's formal address?**
A Well, 211 Oslin Drive.
Q **211 Oslin?**
A Uh-huh (positive response).
Q **What is the legal status of Reach One Teach One?**
A What is the legal status? It's a 501(c)(3).

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It's recognized under the Internal Revenue Service as a charitable educational organization.
Q **All right. Not a private foundation?**
A No.
Q **I'm going to try to see if we can get a little more definitive answers from you about the work of Reach One Teach One.**
Now, you told me that you do not file a 990 because you don't have to because you haven't reached -- or you don't reach that threshold amount.
A Twenty-five thousand ($25,000) dollars, yes.
Q **And it seems like you said twenty-five hundred ($2,500) dollars in grant as opposed —**
A Twenty-five thousand ($25,000) dollars.
Q **-- twenty-five thousand ($25,000) right, as opposed to twenty-five thousand ($25,000) dollars in revenue for a year; is that --**
A Well, that would be basically the same thing. Because in order to get the revenue, it has to be granted.

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Q **That's the only way that Reach One Teach One can -- the only way it can have some income is through grants?**
A Any nonprofit organization that do things are normally granted money. And grant means to be given for free. Now, if they work for services or do a service and are paid that way, then that would be for hire. But normally, that's for a particular individual. So, yes, it's through grants.
Q **You had said earlier that you write grants for people --**
A Uh-huh (positive response).
Q **-- I think.**
A Uh-huh (positive response).
Q **When you write grants for people, do you get -- are you compensated at all?**
A It all depends who it is. If they're -- I pay three thousand ($3,000) for them, and sometimes I write them for five hundred ($500). I did my cousin's for free. I did one of the pastors for free, you know, just to help them out. You know, I just do it

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for free. Some of them I -- Let's see. I can't remember. We did one in Florida, but I was never paid on that one.
Q **All right.**
A We did it for hire. I did it for money in Florida, but I was never paid.
Q **Yes, sir. Now, for the year 2005, how much money would you say Reach One Teach One received in contributions, gifts, grants, or any other fashion, 2005?**
A Probably six -- probably six to eight, maybe, ten thousand ($10,000). Right at ten thousand ($10,000) maybe.
Q **Right at ten thousand ($10,000) maybe?**
A Maybe, yeah.
Q **From whom did you get that?**
A Well, a lot of the money -- I was putting it there. My wife was putting it there. Sometimes I would do something for the people, and they would pay me. I don't put it in my -- say, for instance, if I repaired a car, if I put in a transmission or something, I would put it into my umbrella.

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Q **All right. So, you would do work for a person, say, repair a transmission, and that person would pay Reach One Teach One?**
A They would pay me, but I would put it in Reach One Teach One.
Q **All right. So, at the end of the year or whenever you filed your tax returns, would that money count as income to you?**
A No, not the money that I put into Reach One Teach One.
Q **I mean, money that you received from a person for doing work --**
A Oh, no.
Q **-- for them.**
A No.
Q **That would not count as income to you?**
A No.
Q **Okay. And so, you would not have listed that on your tax returns as income.**
A No, because I put it into Reach One Teach One. Some of the money that I made working I put in Reach One Teach One. That was counted on my tax returns. For instance, at

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the Hyundai place sometimes I might sell 25 cars. I might do ten thousand ($10,000) dollars a month. I might do twelve thousand ($12,000) dollars a month. I might take three thousand ($3,000) and put it into Reach One Teach One. I did twelve thousand ($12,000) one month. I took four thousand ($4,000) dollars and put it in Reach One Teach One.
Q **All right. And when you would get paid from Tallahassee Hyundai, would it be cash or would it be check?**
A Check. I had to pay taxes on that money.
Q **All right. So, no question about that.**
A I had to pay taxes.
Q **All right. But as far as this work that you did -- say, you did somebody's transmission work, if they paid you cash, then you wouldn't necessarily have to pay taxes on that; is that your testimony?**
A No, anytime -- I would never do it above what would get me in trouble. I would never do it above six hundred ($600.00) dollars.

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You know, if I did something for somebody to fix, I might do it -- they might pay me fifty ($50) or thirty-five ($35). I might change a filter for twenty-five ($25), you know. I don't have to report that. But I put it -- Since I don't have to report it to the Federal Government, it's not six hundred ($600) dollars. If it's under six hundred ($600) a year, you know what, it's not -- it doesn't go to me.
So, since I'm putting it in the bank and it's for a 990, it has nothing to do with me as far as taxes. It's any time I go above six hundred ($600) or working where I'm -- I mean, you should know. You're a lawyer. If I make money -- where I'm making big money, ten ($10,000) or twelve ($12,000) or thirty thousand ($30,000) dollars a year doing cars, which I would never do -- I'm not that type of grease monkey -- you know, yeah, I could report that. But this twenty-five ($25), ten ($10) of just helping people, because that's not enough to put in

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my pocket for a living. You know, I put it into the nonprofit to help them. But, now, the money that I am taxed on, you know, that I put in, that ten thousand ($10,000) that I put there, I was taxed on that.
Q **All right. You said in 2005 that Reach One Teach One received approximately ten thousand ($10,000) dollars. And I asked you where did that money come from.**
A From me.
Q **You said that you gave some and your wife gave some.**
A Yeah.
Q **How much did you give -- How much did you donate, I guess, you would say --**
A I don't know.
Q **-- to Reach One Teach One --**
A Maybe --
Q **-- in the year 2005?**
A Maybe four ($4,000) or five ($5,000) thousand.
Q **Four ($4,000) or five ($5,000) thousand?**
A Yeah.

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Q **Do you have any records that would support that?**
A Yeah.
Q **All right. And what records do you have that would support that statement?**
A The bank statements.
Q **Bank statements?**
A Yeah.
Q **All right. And the bank statements would show that you deposited or you gave a gift to Reach One?**
A Yeah.
Q **All right. And how much would you say your wife gave to Reach One during the year 2005?**
A Probably about the same amount. She makes pretty good money too. So, you know, that number is really all nominal. You know, I'm still speculating and guessing. You know, I have to go look at the books.
Q **All right.**
A I know one time I put four thousand ($4,000) or forty-seven hundred ($4,700) in. I know one time I put two in. You know, I don't

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know. I'd have to go and add it all back up.
Q **All right. Now, do you bank at the same bank in Florida that Reach One Teach One banks at? Do you have an account at the same bank?**
A That bank is in Utah, Oregon.
Q **In where?**
A In Utah. I'm sorry. It was not Utah, Oregon. It's in Utah.
Q **The State of Utah?**
A Yeah.
Q **What's the name of that bank?**
A Centennial Bank.
Q **All right. So, you have -- Is that an individual account?**
A Yes.
Q **All right. You have an individual account at Centennial Bank.**
A And my wife has one too individually.
Q **All right. At Centennial Bank?**
A Centennial Bank.
Q **Okay. In Utah. All right. And does Reach**

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One Teach One have an account at Centennial Bank in Utah?
A No.
Q **So, then, when you gave this money to Reach One in 2005, would it have been cash that you gave --**
A Yeah.
Q **-- or would it have been a check drawn on your bank at Centennial Bank?**
A Cash, just cash.
Q **How much money or how much in contributions, gifts, and grants can be attributed from direct public support to Reach One Teach One in 2005?**
A Maybe seventy-five ($75) to a hundred and twenty-five ($125) dollars.
Q **All right. And where or from whom would that money have come?**
A Just people -- just helping fix their cars. One guy had broke down on the highway, and actually, his alternator replaced. I did it, and he gave me twenty-five ($25) dollars. I took it and put it into my Reach

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One Teach One. One guy with a Mercedes -- I actually didn't know -- with the little 190s when the fuel filters clog, it does not shift. So, I told him he needed twenty-one ($21) dollars to fix it. I fixed it and he gave me forty-five ($45) dollars, you know. So, I put that in Reach One Teach One.
Q **2005?**
A Yeah.
Q **All right.**
A But I don't ask for their name. I just help them.
Q **All right.**
A To me, there's no need to.
Q **Did Reach One Teach One receive any money in indirect public support during the year 2005?**
A What's indirect public support? Other than you're talking about me?
Q **You?**
A Yeah, I mean, I just told you that.
Q **All right. Did you receive any money in government contributions, meaning grants?**

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A No.
Q **All right. That's 2005. What about in 2006?**
A No.
Q **What about in 2004?**
A No, no, no, no, no, no.
Q **All right. And when I say "what about," what I'm asking is: Did Reach One receive any government contributions or any grants during the years 2004, 2005 or 2006?**
A No.
Q **Did Reach One receive any government grants in 2003?**
A No.
Q **Any time between 2000 and the present?**
A No.
Q **Okay. Does Reach One have any membership dues or assessments?**
A No.
Q **You don't pay any rent anywhere, do you?**
A No.
Q **And you don't have any assets or any inventory, do you?**

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A No.
Q **Does Reach One -- For the year 2005, rather did Reach One have any expenses?**
A Uh-uh (negative response), no.
Q **During the years 2000 through 2004, did Reach One Teach One have any expenses?**
A Nothing.
Q **And during this year that we are in now, 2006, have you had any expenses?**
A No. I mean, what do you call expenses? Like, we have to pay somebody to do something?
Q **Any expenses?**
A No.
Q **Okay. Do you have any legal fees to pay?**
A No.
Q **No?**
A No.
Q **Okay. Now, you understand that you are a plaintiff in this action, do you not?**
A Yes.
Q **Okay. And are you represented by counsel today?**

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A Kenneth Thomas.
Q All right. And have you been represented by Mr. Thomas since this lawsuit was filed?
A Yes.
Q Okay. Have you incurred any legal bills thus far?
A No.
Q Do you anticipate incurring any?
A No.
Q Do you think anybody is incurring any legal fees on your behalf?
A No.
Q Okay. Is anybody incurring any legal fees on your behalf?
A Not on my behalf.
Q On behalf of Reach One Teach One?
A Okay. Yes.
Q Yes? Okay. Who? Who is incurring?
A Frank Thomas. He told you today.
Q Say it again?
A Frank Thomas.
Q All right. And how much?
A I have no idea.

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Q Okay. Do you know anything about the retainer agreement at all?
A I don't even want to know that.
Q All right.
A Don't even want to go there. If you go there, I'm just going to tell you no, no, no, no.
Q Okay. Whether you know the answer or not?
A I don't know the answer. What I'm telling you, I don't get in that part of it. My saying is that action -- whatever happens here is like I told Mr. DeBray and I told Mr. Carr. My saying is, if they get the money, I'm going to put the money where it should be. All the legal ramifications, I have nothing to do with. Don't want to know about it.
Q All right. Has Reach One Teach One paid out any money to salaries over the past three to five years?
A Never.
Q All right. Have you received any donations during this year that we are in now, 2006?

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A If you want to take the twenty-five ($25) and the forty-five ($45) and thirty ($30) dollars, if you want to say that, yeah.
Q All right. And, now, that money -- When you receive that money, then is a receipt generated on behalf or by Reach One Teach One to give to the people who give this money?
A No, no. They give it to me, and I put it there.
Q All right. So, it's not other people that's giving the money. It's you giving it.
A Yeah. Well, they it to me, and I just bounce it right into the -- Well, I guess you're right, yeah. I do it, then.
Q All right. Because if a person gave a donation to Reach One Teach One, they would receive a receipt, wouldn't they?
A Yes, they would.
Q All right. They would get something so that they can let the IRS know that they donated to a 501(c)(3).
A Yeah, if they gave that big. If it was that

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big.
Q Okay. Now, for each person that gives to Reach One Teach One, does that person receive a receipt regardless of who it is?
A If they give it to Reach One Teach One, yes. You know, but when they give me money, I don't give them receipts.
Q All right. What about when you give money to Reach One Teach One? Do you get a receipt?
A No. I just put it in the bank.
Q All right. And when your wife gives to Reach One Teach One --
A No.
Q -- does she get a receipt? And is there anybody else who has given any money to Reach One Teach One this year, 2006?
A I told you no, man.
Q You're telling me no now. I thought you said earlier that Macon County Investments gave ten thousand, five hundred ($10,500) dollars?
A Well, what Macon County Investments -- Well,

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then, we've already established that. Are you asking me again?
Q **So, the answer is not no.**
A Okay. The answer is not no. I'm thinking you've already established Macon County. We've gone and left there. You're talking about somebody else. If we're going back there, then you need to tell me, you know, what did Macon County Investment give blah, blah, blah.
Q **I am asking is there anybody else?**
A I already told you. Frank Thomas gave me ten thousand, five hundred ($10,500) dollars this year.
Q **Other than that, is there anyone else who has given Reach One Teach One any money in the year 2006?**
A No.
Q **Is there anybody, Frank Thomas included --**
A No.
Q **-- who in 2005 gave Reach One Teach One any money?**
A How many times have I got to say no?

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Q **For the year 2004, is there anyone who donated any money to Reach One Teach One?**
A No.
Q **And for the year 2003, is it the same answer?**
A No, no.
Q **No, it's not the same answer?**
A No, never.
Q **All right.**
A Other than him, other than the little money that I get that I put there, my wife puts there, the answer is no.
Q **All right. And I think you already have said, but let me be sure. With respect to money that you give or donate to Reach One Teach One, you have never received a receipt for it.**
A No. Other than my bank, why would I need a receipt? Well, yeah, I get a receipt for it that I put it in there.
Q **A receipt? No. I'm saying -- Say, if I were to give some money to Reach One Teach One, would I get a receipt?**

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A You would because you would claim it.
Q **All right. So, now, what I'm asking is: Have you been receiving receipts from Reach One Teach One?**
A No.
Q **All right. Now, you filed -- Well, we talked earlier or you talked earlier about your meeting Tom DeBray.**
A Uh-huh (positive response).
Q **And I think you said you talked on the phone a couple of times then you met with him -- you, he, and your wife -- in November or December of 2004.**
A Uh-huh (positive response).
Q **That's a yes, I'm sure?**
A Yes.
Q **All right. And after that, did you then meet with anyone else in connection with getting a Class B license --**
A No.
Q **-- to play bingo?**
A No.
Q **Well, at some point, did you meet with**

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Mr. DeBray again after November or December of 2004?
A No.
Q **Never met with him anymore.**
A No more.
Q **All right. At some point in time, did you meet Frank Thomas?**
A Yes.
Q **When did you meet him?**
A I don't know. It was in 2005 some time. I don't know.
Q **All right. Now, after your meeting with Tom DeBray, what was the next contact you had with anyone concerning bingo?**
A You mean, after my physical meeting with him?
Q **Yes.**
A He called me and told me, you know, because I had called him and asked him -- I hadn't heard from him in, like, six months. I said, "What's up?" Blah, blah, blah, just checking in. Another week later, he called me back. He said, "Well, listen. We're

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having problems." And he started naming all kind of -- two hundred and fifty thousand ($250,000) and $15 million. I said, "Well, whatever, I am not into that. I don't care, whatever. Just let me know when I'm ready to go."
Q **All right. So, probably about -- I say "probably." You said about six months after your conversation with him that was in November or December of 2004. So, that tells me perhaps May or June of 2005, you talked with Tom DeBray again; is that correct?**
A Let's try March -- March or April.
Q **March or April?**
A Yeah. 2005. I just don't remember. He talked to me several times and was telling me he was having problems. And I just wouldn't go into that part with him.
Q **All right. So, did you talk on the phone?**
A Yeah.
Q **All right.**
A The first conversation was about 45 seconds.

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Are we having problems, blah, blah, blah. I said, "Okay. Later." And the next time he still had the problems. So, I said, "Okay. Well, just tell me what you want me to do when you are ready to go when you get ready to do what you need to do. All I'm saying all I'm going to do is ask you to put the money there if this thing passes. I'm just going to distribute the money where it goes. That's all I want to do."
Q **All right. So, you talked with him about March or April 2005. He wasn't ready yet. He had problems; is that correct?**
A That's what he was telling me.
Q **Okay. And so, what was your next contact with anybody about bingo in Macon County?**
A I think then -- I can't remember if Frank called me first or if Mr. Carr called me first. But I had a conversation with him.
Q **When would that have been?**
A Oh, man, probably around April. April, early May because I think I met Frank in May.

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MR. GRAY: What year?
THE WITNESS: 2005.
Q **Okay. So, this would have been maybe a month, maybe less than -- in time from when you had last talked to Tom DeBray?**
A Uh-huh (positive response).
Q **Is that a yes?**
A Yes.
Q **All right. And what did -- you say Frank. I'm sure you mean Frank Thomas, the Third?**
A Yeah.
Q **Or Mr. Carr. When they called you, what was the substance of that conversation?**
A Well, Mr. Carr identified himself and said he had taken on representing Frank, and that he wanted to meet me at some particular point and talk to me and tell me what's going on. And he began to tell me what's happening, blah, blah, blah. And he'd reiterate the things that DeBray was telling me. And then, you know, he kind of told me they was having problems. And he told me about David. I said, "Well, I know David."

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I said, "Oh, you should have let me talk to him."
Q **All right. Let me stop you for just a moment. Now, you say that he said he wanted to meet you.**
A Uh-huh (positive response).
Q **And he told you -- he reiterated some things. What did he --**
A That they were having trouble getting the license.
Q **What did he say was the problem?**
A He said that it was left up to Sheriff Warren.
Q **All right. Did he say whether or not they had followed the rules? Did he even talk about the rules?**
A No. I don't get off on that.
Q **All right. He didn't talk about the rules.**
A I don't even get off in that.
Q **Okay. He just talked about --**
A What they can do and can't do. That's it.
Q **All right. And what is it that they could do?**

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A You know, I guess they could use me.
Q **All right.**
A What they couldn't do is, I don't know, you know, just get the license.
Q **All right.**
A And that's all I wanted to know.
Q **All right. And they mentioned Sheriff Warren?**
A Yeah. He's the one that's -- He's the final say-so for it.
Q **All right. And so, what did they say other than that he's the final say-so for it?**
A That's it.
Q **Did they say it was a problem communicating with him?**
A I didn't get into that part. See, listen to what I'm saying. I don't get into that part.
Q **All right.**
A All he said what they can do or can't do. All the other stuff with that, I'm not in that.
Q **So, what did you tell them you would do**

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since you said that you knew David?
A Well, I thought -- Well, let me talk to him, you know, because David and I grew up together. You know, and I know David. David knows me. And he said, "No. I think it's best that you don't." I said, "Yeah, whatever. Okay." I said, "I know I can talk to him, but if you guys don't want me to, I won't."
Q **All right. And all these conversations were before you actually met Greg Carr face-to-face; am I right?**
A Yeah.
Q **All right. And this conversation would have been around April or early May 2005.**
A Somewhere in there because I met Frank in May. See, you are pinpointing dates that's not significant to me. You know, I'm saying sometime in May when he called me, yeah, okay. Right. And we set up for, like, late May, somewhere in there. And then that's where I met Frank and Mr. Carr together.
Q **All right. And that was your first time**

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meeting Frank Thomas?
A First time.
Q **Late May.**
A I had spoken to him on the telephone.
Q **All right. Late May. Frank Thomas and Greg Carr. Was there anybody else there at that meeting?**
A No.
Q **And where did you --**
A Oh, my wife was with me.
Q **Your wife. Okay. And where was that meeting?**
A Montgomery, Alabama.
Q **All right. And did you and your wife come up from Florida to meet with them?**
A Yeah.
Q **All right. Did you drive up?**
A Yeah.
Q **Did they pay your expenses to come up?**
A The first time, I think Greg gave me something for coming up.
Q **Who did?**
A Oh, that's right. That's right. That's

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right. That's right. I met Greg first before I met Frank, before Frank was together. Then when I came up, I gave them all my information, showed that I was a pertinent 501(c)(3), 1023, Letter of Determination. Then it was just me and Frank -- I mean, Attorney Carr and myself.
Q **All right. So, you met Attorney Carr first.**
A Yes, yes.
Q **Would that have been late May?**
A Uh-uh (negative response). That was before I met Frank. I met Frank in late May. So, between that month of May is when everything happened.
Q **All right. So, when you met Greg Carr, what did you and he talk -- Did he give you an application?**
A No.
Q **Did he say anything about an application?**
A No, no. When I met Greg Carr, all I did is give him all the documents that makes me legal. I gave him my 1023s, 8717s, 872s. I put all that together.

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Q Now, let me stop you for a moment because you're putting a lot of numbers out there. Let's take each one and say what it is. 1023, what is that?
A Well, that's the thing that denotes that I'm a nonprofit.
Q All right. It's an application for a nonprofit?
A Uh-huh (positive response).
Q All right. Next.
A 8718 is the paperwork you sign and put yourself to put the money into.
Q All right. The 8718? All right. That's not the power of attorney?
A No.
Q Okay. What did you say that is?
A It's either 8717 or 8718.
Q What is it?
A You know, when you put your money together, you put your check. You fold it up and put it in with it, and you put all your pertinent information there.
Q Okay. It goes along with the form?

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A Yeah. And the 872Cs are what you put together when you want advanced ruling.
Q All right. And these are also forms that go to the IRS?
A Exactly.
Q Yes, sir. And so, you gave them copies of your -- of all those forms.
A And the by-laws and all that stuff, yes. That's all I did with him. That's it.
Q All right.
A Any conversation about blah, blah this and this and that, blah, blah, blah, I wouldn't --
Q All right. Now, did he tell you at that time that he wanted Reach One Teach One to apply for a license to conduct bingo in Macon County?
A They told me that when I met with Mr. DeBray.
Q From the beginning?
A Yes.
Q All right. And when you came up in May and met with him, did your wife come with you

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that first time?
A No.
Q All right. And did he pay your expenses that time?
A Yes.
Q How much did he pay you?
A Three hundred ($300).
Q And was that cash or a check?
A Cash. But Greg paid that.
Q When you say "Greg," you mean Greg Carr?
A I'm sorry. Yes, Attorney Carr.
Q I just want to make it clear that we are talking about who I think.
A Yes.
Q All right. And did he tell you at the time that he was a shareholder with Frank Thomas?
A No, no. We didn't get into that. No, no, no. Again, my issue was to put the 501(c)(3) in place, give them all the pertinent information. All the mumbo jumbo you guys fight for, I don't even want to know about.
Q Okay. And then you met with Frank Thomas.

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A Yeah.
Q And that was a whole another trip up.
A Yeah. My wife, myself, Frank, and Mr. Carr, Attorney Carr.
Q Now, when did you first learn that charities could obtain a license to play bingo? When did you first learn that?
A Mr. Tom DeBray, brother.
Q All right. And that would have been in November, December 2004?
A Uh-huh (positive response).
Q Yes?
A Yes.
Q Did you vote in the referendum for the bingo?
A Yes.
Q I'm not asking did you vote in favor of it. I'm just asking did you vote in that.
A Yes. I've been voting each year in Tuskegee.
Q Yes, sir. Now, so, when you met Frank Thomas, what was the substance of your conversation then?

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A Oh, he just talked to me and told me what was going on. And at times, he did get a little personnel, but, you know, I didn't care. He was telling me what the problems were, and, you know, what to look out for and who was doing what, and who is this and that.
Q All right. What were the problems?
A That he had problems getting an application from Sheriff Warren.
Q All right. When he told you he was having problems getting an application from Sheriff Warren, did you respond to that?
A No.
Q Did you offer to get an application?
A No.
Q Did he tell you at that time that a nonprofit had to be the entity to apply for a Class B license?
A But I knew that from Tom DeBray.
Q You already knew that.
A Yes.
Q But apparently Mr. Thomas did not know that; would you agree?

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A I don't know.
Q All right.
A We didn't talk about that. When I started with Tom DeBray and it focused further on down to Attorney Carr, I'm assuming that everybody was still in the same step.
Q Okay.
A And what I assume and figured I knew already that they already knew.
Q Okay.
A That's why I did not question them.
Q All right.
A Do you know this or if you don't know this.
Q All right. Did you ask him -- you said that someone told you what to look out for. You said Frank Thomas told you what to look out for. What did he tell you to look out for?
A Well, he said that, you know, there might be trouble. You know how they can be, kind of harmful. But I don't care about that, you know.
Q He said what might be trouble?

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A I tell you what. I don't even remember how he said or what he said it like because it didn't register to me at all.
Q All right.
A It's nothing legitimate or something I should report back to you because it don't bother me one iota. So, again, my whole issue with this thing is as Johnny informed me that they were doing this thing for bingo to actually just put forth all the information pertinent for him to be official to go into Class B bingo.
Q Now, when did you first see an application for bingo?
A I don't recollect.
Q All right. Well, did you see one back when you first met Tom DeBray?
A No. I don't recollect, man. See, I'm not looking at that part. See, you're still trying to put me into legal mumbo jumbo, and I'm not.
Q You filed an application, didn't you?
A Well, I signed the application.

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Q Okay.
A I saw it then, but I don't remember when it was.
Q All right. Well, did you ever go to the jail or to the Sheriff's Office and pick up an application?
A No.
Q So, you never even had to request one --
A No.
Q -- an application. But yet you did have one for you to sign; is that correct?
A Yeah, but it wasn't like, oh, they did it for me. I knew it was going to happen.
Q Right. Because you-all had been talking about it.
A Yes.
Q All right. And, in fact, when you left in late May, did you expect that you would at some point very soon complete an application?
A Well, yeah, I thought at this particular point, you know, that when they went on, you know, things would be okay. I thought it

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was just going to get okay and become right, you know. So, I'm not looking at what will and what will not happen.
So, you know, my life continued to run on without this bingo thing, you know. I focused on other things -- just, you know, other than the application for bingo.
Q **Yeah. I mean, your life is still running on right now.**
A Well, I'm here. You know, so these are things -- your questions you're asking me, you know, they just weren't pertinent to me.
Q **Did you ever talk to the Sheriff about the application?**
A No.
Q **Did you ever talk to the Sheriff about the license?**
A No.
Q **All right. I'm going to show you, sir --**
A Can I take another five-minute break?
Q **Yes, sir.**
(At which time, a recess was taken.)

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Q **Sir, I show you what's been identified as -- or what's been marked and introduced at Frank Thomas deposition as Plaintiff's Exhibit --**
MR. THOMAS: I think it went back to the Sheriff as nine.
MR. GRAY, JR: Sheriff's Exhibit Nine. Thank you.
Q **Do you recognize that document, sir?**
A I've seen it.
Q **What is it?**
A It's Macon County, Alabama, application for bingo licenses.
Q **All right. Now, whose application is that?**
A Well, I don't know what you want me to say, but they filed it on behalf of Reach One Teach One.
Q **All right. Well, I want you to look at page one.**
MR. GRAY, JR: Do you-all mind if I stand up?
A It says Reach One Teach One.
Q **All right. So, that's Reach One Teach One**

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of America, Inc.'s, application for bingo license?
A That's right.
Q **Remember that?**
A Okay. Yeah.
Q **Okay. And Reach One Teach One, for all intents and purposes, is Walter Walker and Cornelia Walker; is that correct?**
A Yeah, uh-huh (positive response).
Q **All right. You're going to need to hold on to it. The information that's provided on pages one and two of the application, who provided that information on the first two pages there?**
A This was probably done from the information that I provided to Attorney Carr.
Q **Okay. You say "probably." You told Attorney Carr the name of your organization, right?**
A He's got all the information.
Q **Okay. So it's not probably. This information came from you; isn't that correct?**

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A Yes.
Q **All right. And is all of the information on here accurate as far as you know? Is the address? Is that your --**
A Yeah. I still live at 211 Oslin Drive.
Q **Okay. Well, you say you still live there, but right now somebody else is living there; am I right?**
A No. He's there. You know, when I come there, I'm there with him. I've got three bedrooms.
Q **All right. He's there. But typically and more times than not you are in Tallahassee, Florida, aren't you?**
A True.
Q **All right. But this address is the address that you provided, 211 Oslin Drive, Tuskegee, Alabama.**
A Yes, my address.
Q **All right. And the information on the next line is information that you provided; is that correct? Name, address, phone number --**

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A Yes.
Q -- of organization of persons in this application is Walter Walker -- Walter W. Walker; is that correct?
A Yes.
Q All right. And this organization is tax exempt; is that correct?
A Yes.
Q And you provide your tax identification number; is that correct?
A Yes.
Q All right. and I ask is that correct. Now, I'm asking is that number correct?
A No.
Q It's not right?
A No.
Q Okay. What is Reach One Teach One's tax identification number?
A 631168841.
Q It is 6 --
A 631168841.
Q It is not 6311168841.
A No.

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Q All right. And I know you just said it, but would you say your number one more time?
A 631168841.
Q All right. Did you at some point -- Well, did you review this application?
A They allowed me to look at it, yes.
Q You say they allowed you to. It's your application.
A It doesn't matter. Yes, they allowed me to look at it.
Q Okay. It's yours.
A They still allowed me to look at it.
Q When you say "they allowed you to look at it," who are you referring to?
A I said that already if that's what you want to hear.
Q Okay. Now, I want to know who allowed you to look at it since you said "they."
A I was in the -- Mr. Carr and Mr. Thomas and Ramadanah.
Q Mr. Carr?
A Attorney Carr.
Q All right. Mr. Thomas?

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A Well, actually Attorney Carr and Attorney Salaam.
Q Attorney Carr.
A And Attorney Salaam.
Q Attorney Salaam.
A Uh-huh (positive response).
Q And Attorney Thomas?
A What's Attorney Thomas?
Q I thought you said Mr. Thomas the second time -- the first time.
A No. I don't know if he was there. I can't recollect. Maybe he was there. But he didn't have anything, you know, talking to me, telling me what was going on.
Q All right. So, at the time that you completed this application, the people present were Attorney Carr?
A Uh-huh (positive response).
Q Attorney Salaam.
A Uh-huh (positive response).
Q And when you say "Attorney Salaam," you mean Ramadanah Salaam-Jones?
A Yes.

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Q Who is here in this conference room today?
A Yes.
Q Does she represent you, by the way? Is she your attorney today along with Attorney Thomas?
A If you want to put it. I've got Thomas and -- Yes. Yes, she is.
MR. THOMAS: She's on the pleading.
Q Okay. Did you know before today that she also is your attorney?
A Yes.
Q All right. Also on page one of that application, it says "Address at which applicant will conduct bingo." Is there a street address given?
A What line is it on?
Q It's about halfway down.
MR. THOMAS: Right there.
A Okay. It says real private --
Q Does it give a street address?
A Shorter, Alabama, no.
Q All right. And, in fact, it refers to another page to an exhibit; am I correct?

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A Yes, Exhibit B.
Q All right. And were you personally familiar with that information on Exhibit B?
A Yes. Yes. I can say, yes.
Q You're familiar with that description, with that legal description?
A He showed me where the thing would be and how it would be made and the pictures and all that. Is that what you're talking about?
Q Well, look at Exhibit B. Go to Exhibit B, sir. You should have before you now Exhibit B to your application; is that correct?
A Okay.
Q Were you personally familiar -- Did you have personal knowledge of that particular description, legal description?
A I might have seen it, read it, but what I was shown was the architectural scheme of things, drawings, and a layout.
Q All right. So, you were not even shown this legal description.
A I mean, if it was in here, I've seen it. I

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just don't remember. I don't remember half the stuff I'm looking at. You know, it probably was there. I just don't remember it.
Q Did it mean anything to you?
A Well, yeah. It seems like the scheme of things, lay it out through the things that was drawn.
Q No, no, no, no. Here's what I'm asking. Did Exhibit B mean anything to you when you saw it?
A You mean, if I cared or not? What do you mean if it means anything?
Q Does it mean anything? Was it significant to you? As you read your application when you get to the part on page one where it says street address, real property described in the attached Exhibit B.
A Oh, yes.
Q And you looked at Exhibit B, does that mean something to you?
A Yeah, it was an important document, I guess, explaining how and what the things being

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made. I assume when I read it, it might be me just presuming something was what he showed me from the picture and the architect drawing and all that. That's what I thought that might be.
Q All right. Did you know where -- the meets and bounds, did you know where this Exhibit B -- what it was describing?
A I just said the building that he showed me.
Q Okay. This is about the building.
A Yeah, the architect.
Q All right.
A The things that he showed me. That's what I assumed it was.
Q All right. So, you assumed Exhibit B was an architectural rendering --
A Of the building.
Q -- of the building?
A Yeah.
Q All right. Then your application also says that you'll -- you have -- On page one. I'm still on the first page. How many days and weeks would bingo be conducted?

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A Seven days a week.
Q All right. And for how long?
A Twenty-four hours.
Q Did you understand that the bingo would be played for 24 hours a day, seven days a week?
A Yes. I mean, I read this. And it's -- I read it. It didn't really make a difference.
Q All right.
A You understand?
Q Yes, sir.
A This legal mumbo jumbo I read it. Okay. Uh-huh (positive response). Just explain it to me. I'll do it. Fine. Signed and rolled on. I do not get off into this.
Q All right. So, when you looked at the application, was it already completed?
A I think the first time we talked it was not.
Q All right. Did you --
A Because they had phoned me to see if I would go through it if I wanted to do it. And he set down and talked to me. Greg sat down

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and talked to me.
Q **When was that?**
A I don't know. I don't know. But they asked me -- they informed me about, you know, if I wanted to go through it, blah, blah, blah. I said okay.
Q **Was that on the same day?**
A No, it was not.
Q **Okay. Was it on the first day that you met --**
A No, it was not.
Q **-- Greg Carr?**
A It was spread between times.
Q **Was it on the time that you met Greg Carr and Frank Thomas, the time you met Frank Thomas for the first time?**
A No.
Q **So, it was the time after that --**
A Uh-huh (positive response).
Q **-- but before you signed the application; is that correct?**
A Yeah.
Q **All right. So, you came to Alabama, then,**

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in 2005. How many times from -- in connection with bingo -- from January to August, how many times would you say?
A Probably three or four times.
Q **All right. Now, when you signed the application, did you sign it in Montgomery, or were you elsewhere?**
A Yeah, it could have been -- Yeah, I was in Montgomery.
Q **You were in Montgomery?**
A Uh-huh (positive response).
Q **And you signed it right there in Montgomery?**
A Uh-huh (positive response).
Q **In the presence of Attorney Salaam-Jones?**
A And Mr. Carr, I believe.
Q **Okay. Was anybody else present when you signed it?**
A I don't recollect. I think Frank was there. Frank is always there.
Q **All right. Did you understand a difference between class A or Class B bingo licenses?**
A Attorney Carr explained it. He explained it to me.

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Q **All right.**
A And he said one was bingo cards and one was dealing with electronics. But, again, brother, listen to me. I don't get off into this part of it, and you continue to ask me this. But I don't get off into this part, what it is and what it is not. They tell me the goal they're trying to reach. They tell me. They explain it to me. I said, fine. All I'm doing is taking the money and putting it where it needs to go. The mumbo jumbo is yours.
Q **All right. Well, let me ask you this question. Did you sign a contract or enter into an agreement with Macon County Investments to have them to operate bingo for you?**
A Is this the document that does that?
Q **That's what I'm asking you. Did you enter into any such document?**
A Is my signature on this? Yes.
Q **Your answer is yes?**
A Yes.

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Q **Okay. What were the terms of the agreement?**
A Well, didn't get into that.
Q **You say you signed an agreement you didn't get into?**
A I didn't get into it. You know, I know it might sound strange to you. They threw some numbers out. They were all nominal to me. It didn't matter. You're not getting it. It doesn't matter.
Q **As astute a businessman you are, you didn't pay attention to the terms?**
A It doesn't matter. You're not listening to me. I don't get off on that. If they give me one thousand ($1,000), five thousand ($5,000), ten thousand (10,000), fifty thousand ($50,000), I'm going to do what I need to do with it.
Q **So, now, who prepared the application? Do you know that?**
A I didn't ask.
Q **All right. Did someone simply ask you to sign it?**
A No one simply asked me to do anything.

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Q **What happened?**
A They asked me if I wanted to do it first. And when they sat down and explained it to me, I said, "Okay." When they explained it all, what was going on, I looked at it. They showed me, and I said, "Okay. No problem." I signed it.
Q **When did you sign it?**
A I don't remember. What's the date on it?
Q **What's the date on it?**
A 8th July.
Q **Pardon me?**
A July 8th.
Q **All right. What year?**
A 2005.
Q **All right. Now, that's the date that you signed what?**
A This particular document. The Macon County Alabama, application for a bingo license.
Q **Oh, that's the date you signed the application? Look on page one and tell us what does that date represent. What does that represent?**

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A July 20th.
Q **No. I'm asking what does that date tell you?**
A That's probably the date that he filed it.
Q **When you say "the date he filed it," who are you referring to?**
A Well, whomever took it -- whoever took it over. I don't know. Again, I read this part. When they do their part, they do it. I don't get off into this. So, you know, let's see who else signed it. My wife's signature on this? Yeah. She signed it with me.
Q **She signed what with you, sir?**
A This particular document.
Q **What particular document? Just tell me.**
A Bingo operation and lease agreement.
Q **Okay. So, the bingo operation and lease agreement is between what parties?**
A I would imagine MCI and -- MCI and Reach One Teach One of America.
Q **All right. It's between Macon County Investments and Reach One Teach One of**

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America?
A Uh-huh (positive response). Yes.
Q **Thank you. And does your bingo operations and lease agreement detail the amount of money that Reach One Teach One will receive for each bingo session?**
A They gave me a number. I brain dumped it. Like I keep telling you, it doesn't matter. He gave me a number. I do not remember. It doesn't matter.
Q **Does the lease agreement set forth a number?**
A I have no idea.
Q **Did you read it before you signed it?**
A I went through it, but I didn't try to -- I went through it and made sure everything I did was right, looked at some of the stuff. I'm not interested in, you know, who this guy is and this guy. I looked at this and make sure this was straight. Looked to make sure that was straight. Other than that, you know --
Q **When you say you looked to make sure this was straight and make sure that that was**

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straight, what did you mean?
A The only thing I missed was the 631116 that was wrong. When I looked at the numbers, that was incorrect. But I went through this. I'm not interested in this. If you're going to make me interested, I'm not, as I keep telling you. It seems like you're not getting it. I don't care about the legal mumbo and jumbo. All I'm doing is helping MCI to work in the same way that the person you represent make money, of course, you know. You want to make money. So, Defendant Frank wants to make money. We all want to make money at some point. My point of making money is so I can help the community. I don't know what you guys do with your money. But my thing is to make sure it gets back to the community. So, again, what does one thousand ($1,000), twenty thousand ($20,000), fifty thousand ($50,000), a million, it doesn't matter. I'm going to use it for what it's used. All this stuff in here, I do not care.

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Q **Did you pay attention to the number of years that you were locked into this agreement?**
A The same number that McGregor has his, 20.
Q **All right. And you were okay with that?**
A Okay with that.
Q **Is that yes?**
A That's yes.
Q **All right. Did you have to pay any license fees?**
A No.
Q **Did you have to pay any application fee?**
A No.
Q **Did anybody tender any license fees on your behalf? When I say "your," I mean Reach One Teach One.**
A Yes.
Q **Who did that?**
A I don't know.
Q **How much did they tender on your behalf?**
A I don't know.
Q **Well, how do you know someone tendered some license fees on your behalf?**
A Well, I just know they had to.

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Q **Do you know who had to?**
A Well, I don't know. Again, I didn't get off into that.
Q **They did or they didn't. You don't know.**
A I don't know.
Q **All right.**
A I don't care.
Q **Did you understand that the rules and regulations of the Sheriff required what's called a qualified location in order to receive a license? Did you understand that?**
A Yes, I did, you know.
Q **And did you understand that at the time that you entered into this agreement that there was no physical --**
A Yes.
Q **-- qualified location?**
A Yes.
Q **And at the time that your application was submitted to the Sheriff, you know that there was no qualified location.**
A Yes.
Q **Even today, other than Victoryland, is there**

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a qualified location for bingo --
A No.
Q **-- in Macon County?**
A No.
Q **So, then who is your -- Who or where is your qualified location?**
A Well --
Q **Do you have one?**
A No, we don't. We don't have one.
Q **Okay. Does MCI, Macon County investments, have any agreements with you other than this bingo operation and lease agreement?**
A No.
Q **Do you know if they have any agreements with anybody else that would allow you to start up the bingo?**
A No.
Q **No, you don't know or, no, they don't?**
A I don't know. No, I don't know.
Q **Do you know Mr. Ken Upchurch of W.K. Upchurch Construction?**
A No.
Q **Do you know Mr. Jim Barganier?**

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A No.
Q **Have you met him before?**
A No.
Q **Have you submitted evidence to the Sheriff that your qualified location has -- that meets any of his requirements?**
A No. When you say "requirements," tell them to me. What requirements?
Q **First of all, there is a facility that is in value $15 million or more. Let's start there.**
A Okay.
Q **What's the answer?**
A No. We don't have that.
Q **A facility that has public liability insurance of $5 million dollars?**
A Well, there's no building, so there's no insurance.
Q **Okay. Do you still need me to go through each identifying characteristic?**
A Well, I think that's --
Q **Does it have adequate parking? No. The answer would be no.**

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A It's no to all of it because there's no building.
Q **Okay. Did you submit with your application any personal data sheets for your board members?**
A No.
Q **No?**
A No.
Q **Why not?**
A I wasn't asked for it.
Q **Did the application call for it?**
A I don't think so.
Q **You don't?**
A I think if it called for it, he would have asked me for it.
Q **When you say "he," who are you referring to?**
A Well, they.
Q **When you say "they," who are you referring to?**
A The attorneys.
Q **Your attorneys?**
A Yeah.
Q **And when you say "the attorneys," you're**

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referring to Attorney Salaam --
A And Carr.
Q **-- and Carr. All right. Because they were the ones who were there with you when you signed this application, right?**
A Yes.
Q **Okay. Are you sure about that?**
A I'm sure I was there with them.
Q **You are sure that those are the people that were with you when you signed the application?**
A I mean, Frank was there.
Q **Well, you said Frank was always there.**
A Yeah, he's always there. You know, but I don't -- You know, unless you know somebody else that I'm missing. You tell me.
Q **No, I'm just saying, are you certain that these lawyers were --**
A I'm not certain of anything, man. I'm not certain I'm sitting here.
Q **Okay. Well, let me ask you this: You may not be certain about this either. Sorry. Let me have this back.**

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I show you what's been marked and identified at a previous deposition. And that's an application -- instructions and application. You've seen that before, haven't you?
A Yes.
Q **That's the instructions and application -- instructions and application for a Class B bingo license. You've seen that, right?**
A Uh-huh (positive response).
Q **Okay.**
A Yes.
Q **Now, as you peruse that document, do you see a sheet that requests personal data of the board members?**
A I don't recollect seeing this one.
Q **I'm asking as you look at it now.**
A I see it now.
Q **You see it now.**
A I might have did it, but I don't remember.
Q **All right. So, now, let's just say if Frank Thomas or if Macon County Investments had retyped the application, you may not have**

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seen it; isn't that true?
A If they retyped it, maybe.
Q **Or they may not even have given it to you, right?**
A Probably.
Q **And you really wouldn't have known that it was required because you simply looked at what they prepared and signed it; isn't that true?**
A Yes.
Q **All right.**
A Like, again, if it's not there, then it doesn't exist.
Q **All right. And if it is there --**
A Then it exists, and I'll do it.
Q **All right. And you'll do it. All right. So, now, let me ask you: Did you complete personal data for the members of your corporation?**
A No.
Q **No?**
A Not to my knowledge.
MR. THOMAS: Need another document.

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A Let me see.
MR. THOMAS: You have to review the document, Reverend.
A Okay.
Q And you're saying okay now that you're looking at it.
A Okay. Now -- Okay. So, I did it.
Q Did you submit with your application any list of criminal convictions that you or any of your board members have?
A No. Just me and my wife.
Q I don't know if you told me this or not. Did you say that you don't know who completed this application when you say you don't know who did it?
A Who completed it?
Q Right.
A No.
Q No, you didn't say it or, no, you don't know?
A I don't know who completed it. I know, you know, it was done. They asked me if I wanted to do it, then they did it. Let me

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read it, and I said, "Okay."
Q All right. Will Reach One Teach One prepare and tender a license fee and operator's fee if the Court orders that a license be issued to it?
A Everything that needs to be done will be done.
Q All right.
A Yes.
Q And does Reach One Teach One have any money to do that?
A I don't need it.
Q You don't need money?
A No.
Q Why not?
A Because it would be tendered for me.
Q And who's going to tender it for you?
A I don't know yet, but it will be done.
Q All right. Now, have you had -- and pardon me if I have asked you this question.
A Okay.
Q I just don't remember. Have you had any conversations with Sheriff Warren concerning

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the application -- concerning Class B bingo license application?
A No, I haven't.
Q Have you had any conversations with him concerning bingo at all?
A No, not at all.
Q Do you know anything or have you heard of any conversations between the Sheriff and anybody about bingo in Macon County?
A That the Sheriff is having conversations with anybody?
Q Right.
A No, no. I don't listen to that kind of stuff any more. I'm not even interested.
Q Have you heard anything about anything like that?
A No. I don't hear it, no.
Q Now, you met Frank Thomas through Greg Carr; is that right?
A Yes.
Q And you met Greg Carr through Tom DeBray; is that correct?
A Yes.

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Q And you met Tom DeBray as a result of talking to Johnny Ford; is that correct?
A Yes.
Q Have you met and talked to any other people connected with or who are a part of Macon County Investments?
A No.
Q When I say "any others," I mean other than Frank Thomas --
A No.
Q -- and Greg Carr.
A No.
Q Has Reach One Teach One been promised or assured that it will receive any money as a result of lending its name to MCI --
A No.
Q -- for the bingo?
A No, not like that, no.
Q How does Reach One Teach One get any money?
A Well, you know, you say -- Well, the way you're wording it, you know, it's -- If they do it under the auspices of Reach One Teach One, yeah, they said there will be money.

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There will be a certain amount.
Q **How much?**
A I don't remember. You keep asking me, and I'm telling you that's not important to me. Again, I don't remember.
Q **All right. Now, what's the -- Does Reach One Teach One intend to be the only charity operating bingo at this facility if Macon County Investments gets a license?**
A I can only speak for Reach One Teach One. How would I know who else would come on the board?
Q **Would you be opposed to other charities?**
A Why should I be? No.
Q **Do you understand or do you think that Reach One Teach One under your agreement will receive money every week from Macon County Investments?**
A I think that's what was spoke to me. Again, I think, man. I think maybe he said it, you know, but, again, it wasn't that important.
Q **All right. You said that you have an individual bank account in Utah, and you**

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said Centennial Bank, but I didn't ask you what city. What city in Utah?
A Ogden.
Q **Ogden? All right. Do you have an individual bank account or bank accounts in Tallahassee, Florida?**
A Yeah, Reach One Teach One.
Q **All right. Do you?**
A Yeah, I have a savings there.
Q **All right. At what bank?**
A Florida Commerce.
Q **Florida Commerce? The same bank that Reach One Teach One has an account?**
A Yeah, I opened one. I was going to buy a vehicle. In order for me to buy a vehicle, I had to open an account. So, I opened an account there. So, what I did, I had to open an account there for the vehicle. But I changed my mind. I didn't go through Florida Commerce, I went through Alabama Exchange. So, I'm actually going to dissolve that account.
Q **All right. And does your wife also have an**

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individual account in Florida?
A No.
Q **No?**
A No.
Q **All right. Did you say you dissolved your account at Florida Commercial.**
A I'm going to dissolve it, the one at Florida Commerce because, see, in order to buy a car --
Q **You said you're going to?**
A Yeah.
Q **But it's still there right now?**
A Yeah.
Q **All right.**
A It's still there.
Q **And Reach One Teach One has an account there.**
A Yeah, they have had one there since we've been there.
Q **Does Reach One Teach One have one -- Does it -- I know it has one at Maxwell --**
A Maxwell.
Q **-- Air Force. Does it have one in Macon**

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County?
A No. Because the one in Macon County, I've got to pay for it. And since I'm military, I get it for free.
Q **All right. What -- This fire that you say -- When your car caught fire, what records concerning Reach One Teach One did you lose?**
A We had some of the tapes there, some of the cassettes. All of our minutes because we keep them in the book. And actually, we was getting ready to do something in Florida. So, I had put the minutes there, and we were writing them.
So, we were coming in from Auburn and the whole car burned. It actually started at the bottom. And from the time I drove from where the -- coming down the hill where the baseball field is and drove it to the fire department, which took me 20 minutes to get up. Before they got there, the car burned up.
Q **Nobody was in there when it actually --**

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A My wife was. She jumped out.
Q If I could just have one moment.
(At which time, a recess was taken.)
Q Now, you applied for a Class B bingo license. You do know that somebody took your application and submitted it.
A Yes, yes.
Q All right. And they did it with your permission; is that correct?
A Yes, yes. They talked to me about it.
Q Okay. Now, is there anything that -- Let me ask you this question, though: Back in 2004, is there anything that would have prevented you from signing an agreement with Victoryland and getting a Class B license right then?
A Well, yes.
Q All right.
A Do you want to hear it?
Q Well, I want to know --
A Well, several times I've gone to Sergeant Whitehead because he was trying to get some

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vouchers for the kids that were going to college to give them money to buy books.
Q Now, is this responsive to the question?
A To the question.
Q Is it something that stopped you from signing on with Victoryland?
A Let me finish. If you listen, you'll see where I'm going with it.
Q Go ahead.
A So, then, we took it and talked to Sergeant Whitehead, and they took it to Victoryland. I gave Johnny -- was it Johnny? No, I gave it to Sergeant Whitehead. Okay. Listen. See can we get on. That's before I even knew these guys. See can I get on as one of the 501(c)s at Victoryland. I never heard from anybody. I called down there and said Listen, I have an application to blah, blah, blah, Walter Walker for these guys at Victoryland. "Do you have it?"
"Well, yeah, well, you have to talk to Mr. McGregor."
I said, "Why? I thought that

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you" --
Well, they said, "You handle this." Well, "Yes."
I said, "Okay." I talked to Sergeant Whitehead. I said, "Sergeant, what came of the issuance that I gave you for the voucher for the money, become part of Victoryland?"
"Oh, I guess they're going to get to you." He never did.
Q I'm missing something.
A Oh, you're missing it because I put in for it, and they never, ever, ever got back with me.
Q All right. Let me just ask you the question because you're talking about a voucher.
A No, no, no, no.
Q So, let me ask you --
A Okay. The first time --
Q Just a moment.
MR. THOMAS: Answer his question.
Q I need to ask you a question because maybe I asked the wrong question. I don't know

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anything about a voucher.
A Okay.
Q Here's my question. Well, now I'll just ask you a different question because that might help us to get there.
A Okay.
Q Prior to your application of July 20, 2005, had you ever submitted to the Macon County Sheriff an application for a bingo license?
A Oh, no, not to Macon County Sheriff. I thought you asked me if I had asked to be a part of the bingo with McGregor.
Q I'm wanted to establish that first.
A Okay. Okay.
Q And do you understand that the instructions for a bingo license application called for the applications to go to the Macon County Sheriff's Department?
A Yeah, well, see, that might --
Q Did you understand that?
A No, I didn't understand that because I never saw those rules.
Q That's fine. Okay. Now, let me ask you

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this question.
A Okay.
Q **Is there anything that prevented you from applying for and getting a Class B license and using Victoryland as your operator?**
A Yes.
Q **What prevented you from doing that?**
A Ignorance of the application. It was given to Sergeant Whitehead and Johnny Ford.
Q **Okay. I'm trying to just get it into compartments.**
A Okay.
Q **You say ignorance of the application?**
A Yes.
Q **All right. Because you never went physically and picked up an application; is that correct?**
A When I gave it to Sergeant Whitehead, he never told me to go pick up an application.
Q **All right. And when you say "when you gave it to Sergeant Whitehead," when you gave what to Sergeant Whitehead?**
A All the information he needed: Letter of

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Determination, board of directors, blah, blah, blah, yada, yada, yada.
Q **No, no. I need to know. When you say "blah, blah, blah" --**
A Well, you know. Well, you know the -- all the stuff you need.
Q **You gave some things to Sergeant Whitehead?**
A Yeah.
Q **I'm going to show you -- I'm going to put back in your hands your application.**
A Okay.
Q **And, if you will, go through some of the things that you're talking about earlier.**
A No --
Q **All the things that you're talking about are in that application. Then tell the Court, please, what you gave to Sergeant Whitehead in an attempt to secure a Class B license and have Victoryland as your operator.**
A Okay. I gave him a Letter of Determination.
Q **And when you say "a Letter of Determination," what do you mean?**
A Internal Revenue Service.

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Q **All right.**
A I gave him my State seal.
Q **All right. And when you say "State seal," what do you mean?**
A Alabama State seal.
Q **That says what?**
A State of Alabama --
Q **Certificate of Incorporation?**
A Yes.
Q **All right. I just need to know -- See, the State seal is on a lot of different documents.**
A You're right. You're right. I need to be more specific.
Q **All right. What else?**
A I gave him my Articles of Incorporation.
Q **All right.**
A Along with my 1023. Let's see. What else? Yeah. That's -- Yes. That's the Letter of Determination. I gave him that.
Q **Did you give him anything else?**
A Yeah, that's it. All the articles stating how we function.

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Q **When you say "all the articles," you mean your Articles of Incorporation?**
A Yes.
Q **All right. Is there anything else that you gave Sergeant Whitehead?**
A That's it.
Q **And when did you give these documents to Sergeant Whitehead?**
A 2000 and -- late 2003 or early 2004.
Q **So, you're saying soon after bingo was available?**
A Yeah, but initially I was just going under the premise to become, you know, under him, you know. The bingo came about because at that time -- yes, they had voted for it. You're right. You're right. You're right. Precisely.
Q **Okay. So, you're thinking that it had to do with bingo or something else?**
A Well, you know, it was with the bingo, you know. Initially -- When we initially went and thought to put the things together, bingo hadn't passed.

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Q Okay.
A But we hadn't given anything to Whitehead, but we were going to get in with McGregor.
Q To do what?
A To become part of -- one of his 501(c)(3)s.
Q Now, do you -- Are you thinking about the 501(c)(3)s, or are you thinking about the charity day with the Macon County Racing Commission?
A No, sir.
Q You're not?
A It's with Mr. McGregor because I had asked at one time that I could talk with him, and the female was supposed to get back with me, and she never did.
Q All right. And this was before bingo?
A Before bingo.
Q And you're saying that Victoryland has some preferred 501(c)(3)s before bingo?
A Yes.
Q That it gave --
A Yeah. Well, now, I spoke to him then. Then after the bingo period, I gave it to

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Sergeant Whitehead to become one of the 501(c)(3)s for him.
Q For who?
A With Milton McGregor with the dog track. Okay. Then --
Q You're talking about bingo or are you talking about the dog track?
A Well, it's all the same, isn't it?
Q I'm asking you: Are you talking about bingo, or are you talking about something that has to do with the dog track?
A At first there was no bingo when we were trying to become one of the 501(c)(3)s. See, there were guys that did not have a 501(c)(3) that wanted to use my 501(c)(3) to get money from McGregor. I said, "Well, we're already there."
Q You mean just to get money -- just to get a donation from Victoryland?
A No, no, no. Didn't you say that Victoryland has 60 nonprofit organizations with them? We tried to become one of the nonprofit organizations with Victoryland. Okay? Then

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when the other inference came in, we went to Sergeant Whitehead.
Q Wait a minute. So, you tried to become, you're saying, one of the 60. At what point did you do this?
A We initially started in 2003, then 2004.
MR. THOMAS: That's what he's been testifying to, Fred.
Q I haven't heard anything about 60 in 2003 and 2004.
A No, no. I didn't say 62. I said one of their 60 now. That's what I'm going to.
Q All right.
A But he wouldn't. They never got back with me. They were never -- I even called them and I talked to the female. They would not.
Q All right. So, now, do you have a copy of the application that you gave to Sergeant Whitehead or whatever papers you gave to Sergeant Whitehead then?
A He has it all. I never got nothing back from him.
Q And the military man that you are, you

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didn't keep a copy?
A I sure did not.
Q All right.
A I didn't think I had to.
Q That's all I have.

CROSS-EXAMINATION

BY MS. JONES:
Q Just a few. Where are you registered to vote?
A Tuskegee, Alabama.
Q And when is the last time you voted in an election?
A Last year.
Q Last year?
A Uh-huh (positive response).
Q And for the past three years, what has been the legal address of Reach One Teach One?
A 211 Oslin Drive.
Q You spoke about a meeting where you signed this application before you.
A Yeah.
Q And you stated that Greg Carr and myself were there. Are you still -- Are you sure

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about that?
A No, no. I've got jelly in the brain.
Q Who was present at that?
A Well, you see, I'm getting apples and oranges put together. I know Frank is always there. I know wherever I breathe, I know Frank is there. So, I know there ain't no problem with that. But the first time we initially -- jog my memory -- it was Frank and Greg.
Q Okay. And I was not present.
A You sure was not.
Q Okay.
A So sorry. Don't slap me.
Q When you signed this application, you knew that MCI had a proposed location for their bingo facility?
A Yes.
Q But you didn't know about all the architectural specifics about it.
A Well, other than what I've read and what he showed me. Now, remember he showed me all the things about it. But I didn't know

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specifically, no.
Q You didn't know the specific legal description of the land.
A No, no, no, no. Didn't get off in that.
Q Do you feel that Victoryland should be the only location where you can --
A No.
Q -- operate your Class B bingo license?
A No, that's asinine.
MR. THOMAS: All right. That's all.
(Deposition concluded at approximately 7:06 p.m.)
* * * * *
FURTHER DEPONENT SAITH NOT
* * * * *

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REPORTER'S CERTIFICATE

STATE OF ALABAMA)
ELMORE COUNTY)

I, Jeana S. Boggs, Certified Professional Reporter and Notary Public in and for the State of Alabama at Large, do hereby certify on Friday, August 18th, 2006, that pursuant to notice and stipulation on behalf of the Defendants, I reported the deposition of WALTER WALKER, who was first duly sworn by me to speak the truth, the whole truth, and nothing but the truth, in the matter of MACON COUNTY INVESTMENTS, INC., REACH ONE, TEACH ONE OF AMERICA, INC, Plaintiffs, versus SHERIFF DAVID WARREN, in his official capacity as the SHERIFF OF MACON COUNTY, ALABAMA, Defendant, Civil Action No. 3:06-CV-224-WKW, now pending in the United States District Court for the Middle District, Eastern Division of Alabama; that the foregoing colloquies, statements, questions and answers thereto were reduced to 222 typewritten pages under my direction and supervision; that the deposition is a true and

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accurate transcription of the testimony/evidence of the examination of said witness by counsel for the parties set out herein; that the reading and signing of said deposition was not waived by witness and counsel for the parties.

I further certify that I am neither of relative, employee, attorney or counsel of any of the parties, nor am I a relative or employee of such attorney or counsel, nor am I financially interested in the results thereof. All rates charged are usual and customary.

This the 23rd day of August, 2006.

Jeana S. Boggs
Certified Court Reporter and
Notary Public
Commission expires: 8/7/2010

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ERRATA SHEET

I, WALTER WALKER, the witness herein, have read the transcript of my testimony and the same is true and correct, to the best of my knowledge, with the exception of the following changes noted below, if any:

Page / Line / Change / Reason

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____
WALTER WALKER

Sworn to and subscribed before me, this the _____ day of __________, 2006.

____
Notary Public
My commission expires:________

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